

TSD File Inventory Index

Date: September 12, 2002

Initial: CMH/...

Facility Name: <u>GMC (Chevrolet Detroit Assembly Plant - One Ford Drive)</u>			
Facility Identification Number: <u>MID 076 388 583</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status		.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)	Y
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement	X
.4 Financial Insurance (Sudden, Non Sudden)	Y	.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports	Y	C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	Y
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	Y
.2 Closure/Post Closure Plans, Certificates, etc	X	D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
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.2 Interim Measures		.1 Correspondence	
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.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
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.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual fields per schedule.*

A.2 Part A/
Interim Status



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

MAY 25 1982

F.B. Quakenbush, Plt. Engr.
GMC Chevrolet Detroit Assembly
601 Piquette
Detroit, Michigan 48202

RCRA ACTIVITIES

RE: Interim Status Acknowledgement USEPA ID No. MID0763B0583
FACILITY NAME: GMC Chevrolet Detroit Assembly

Dear Mr. Quakenbush:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Robert D. Lund, Vice President

copy
TB
05-25-82

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).



Notification of Hazardous Waste Activity

Comments

[illegible]

Installation's EPA ID Number													Approved		Date Received (yr. mo. day)		
C											T/A	C					
F												1					

T R U C K & B U S D E T R O I T A S S E M B L Y

Street or P.O. Box

[illegible]

City or Town																		State	ZIP Code					
C	D	e	t	r	o	i	t											M	I	4	8	2	0	2

Street or Route Number

[illegible]

City or Town															State	ZIP Code					
C	D	e	t	r	o	i	t									M	I	4	8	2	0

Name and Title (last, first, and job title)

[illegible]

A. Name of Installation's Legal Owner

C	G	e	n	e	r	a	l	M	o	t	o	r	s	C	o	r	p.	P
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	----	---

A. Hazardous Waste Activity

☒ 1a. Generator ☐ 1b. Less than 1,000 kg/mo.

☐ 2. Transporter

☐ 3. Treater/Storer/Disposer

☐ 4. Underground Injection

☐ 5. Market or Burn Hazardous Waste Fuel
(enter "X" and mark appropriate boxes below)

☐ a. Generator Marketing to Burner

☐ b. Other Marketer

☐ c. Burner

B. Used Oil Fuel Activities

☐ 6. Off-Specification Used Oil Fuel
(enter 'X' and mark appropriate boxes below)

☐ a. Generator Marketing to Burner

☐ b. Other Marketer

☐ c. Burner

☐ 7. Specification Used Oil Fuel Marketer (for On site Burner)
Who First Claims the Oil Meets the Specification

☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

☐ A. Air ☐ B. Rail ☒ C. Highway ☐ D. Water ☐ E. Other (specify)

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☐ A. First Notification ☒ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number											
M	I	D	0	7	6	3	8	0	5	8	3

C																		T/A	C
W																			1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F	O	O	5		
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable
(D001)

☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☐ 4. Toxic
(D000)
XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature <i>R. L. Thornton</i>	Name and Official Title (type or print) R.L. Thornton-Plt. Manager	Date Signed <i>12 May 86</i>
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EPA Form 8700-12 (Rev. 11-85) Reverse

* This certification is made on behalf of General Motor Corporation.

GSA No. 12585-XX
Form Approved OMB No. 155-F-004-0001

Please print or type with ELITE type 12 characters/inch, in the shaded area only.

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY		INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).
I. NAME OF INSTALLATION Chevrolet Detroit Assembly 601 Piquette Avenue Detroit, Michigan 48202		FOR OFFICIAL USE ONLY COMMENTS <div style="border: 1px solid black; padding: 5px;"> MID 076380583 SMALL QUANTITY GENERATOR </div>
II. INSTALLATION MAILING ADDRESS STREET OR P.O. BOX 601 PIQUETTE CITY OR TOWN DETROIT MICHIGAN ST. MI ZIP CODE 48202		
III. LOCATION OF INSTALLATION STREET OR ROUTE NUMBER 601 PIQUETTE CITY OR TOWN DETROIT MICHIGAN ST. MI ZIP CODE 48202		
IV. INSTALLATION CONTACT NAME AND TITLE (last, first, & job title) F B QUAKENBUSH PLANT ENGINEER PHONE NO. (area code & no.) 313-556-6325		
V. OWNERSHIP A. NAME OF INSTALLATION'S LEGAL OWNER GENERAL MOTORS CORPORATION B. TYPE OF OWNERSHIP (enter the appropriate letter into box) F = FEDERAL M = NON-FEDERAL N = <input checked="" type="checkbox"/>		VI. TYPE OF HAZARDOUS WASTE ACTIVITY 57 <input checked="" type="checkbox"/> A. GENERATION 58 <input type="checkbox"/> B. TRANSPORTATION (complete item VII) 59 <input checked="" type="checkbox"/> C. TREAT/STORE/DISPOSE 60 <input type="checkbox"/> D. UNDERGROUND INJECTION
VII. MODE OF TRANSPORTATION (transporters only) <input type="checkbox"/> A. AIR <input type="checkbox"/> B. RAIL <input type="checkbox"/> C. HIGHWAY <input type="checkbox"/> D. WATER <input type="checkbox"/> E. OTHER (specify):		
VIII. FIRST OR SUBSEQUENT NOTIFICATION Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. number in the space provided below. <input checked="" type="checkbox"/> A. FIRST NOTIFICATION <input type="checkbox"/> B. SUBSEQUENT NOTIFICATION (complete item C)		C. INSTALLATION'S EPA I.D. NO. MID 076380583
IX. DESCRIPTION OF HAZARDOUS WASTES Please go to the reverse of this form and provide the requested information.		

AUG 20 1980

I.D. NO. - FOR OFFICIAL USE ONLY

W 1220 126580 583 1

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 1 7 23 - 26	2 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 F 0 0 7 23 - 26	14 F 0 0 8 23 - 26	15 F 0 0 3 23 - 26	16 F 0 0 2 23 - 26	17 F 0 0 1 23 - 26	18 F 0 0 5 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U 0 0 2 23 - 26	32 23 - 26	33 23 - 26	34 U 0 7 5 23 - 26	35 U 0 8 0 23 - 26	36 U 1 2 2 23 - 26
37 U 1 5 4 23 - 26	38 U 1 6 9 23 - 26	39 U 1 8 8 23 - 26	40 U 2 1 0 23 - 26	41 U 2 2 0 23 - 26	42 U 2 2 6 23 - 26
43 U 2 3 9 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark 'X' in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.23.)

☒ 1. IGNITABLE☒ 2. CORROSIVE☐ 3. REACTIVE☒ 4. TOXIC

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



OFFICIAL TITLE

Plant Manager

DATE SIGNED

8-4-80

EPA Form 8700-12 (2-80) REVERSE

BILLING CODE 6560-01-C



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• MID076380583 REACKNOWLEDGEMENT

GMC CHEVROLET DETROIT ASSEMBLY
601 PIQUETTE
DETROIT MI 48202

INSTALLATION ADDRESS

601 PIQUETTE
DETROIT MI 48202



June 26, 1987

Andrea R. Schoenrock
Technical Services Section
Hazardous Waste Division
Michigan Depart of Natural Resources
Steven T. Mason Building, Box 30028
Lansing, Mi. 48909

Re: GMC Detroit Assembly Withdrawal of RCRA Part A
Application (MID 076 380 583)

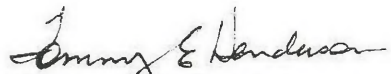
Dear Ms. Schoenrock,

This letter is in response to your request of May 28, 1987, regarding the withdrawal of our Resource Conservation and Recovery Act (RCRA) Part A and Act 64 Construction permit application.

Since the items you address in your letter are new comments which were not addressed in any of your previous correspondence, we are requesting a 120 day extension for the submittal of a revised closure plan. Because of the nature and specificity of the additional items, we intend to hire an independent Professional Engineer to assist us in the planning, implementing and to certify closure. The added time will allow our facility to issue bids and hire an appropriate consultant.

If you have any questions, please call Jim Nachtman at (313) 456-6915.

Many thanks for your cooperation.


Tommy E. Henderson
Senior Project Engr.

cc.D.M. Spencer, US EPA Region V



RECEIVED

AUG 12 1986

August 7, 1986

U.S. EPA REGION V

RECEIVED
AUG 12 1986
SOLID WASTE BRANCH
U.S. EPA REGION V

Y.J. Kim, Acting Chief
Technical Programs Section
Waste Management Division
US EPA Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: GMC Detroit Assembly Withdrawal of RCRA Part A Application
(MID 076 380 583) *C, TSD PA*

Dear Mr. Kim:

This letter is in response to your request of June 18, 1986, regarding the withdrawal of our Resource Conservation and Recovery Act (RCRA) Part A permit application. Thank you for granting us an extension to respond to your requests by August 8, 1986. Enclosed is the additional information and action plans.

Since November 11, 1980, to the present, our manufacturing plant has requested to use three areas to store Hazardous Wastes (HW). The three areas in which storage occurred are marked in the plot plan (Attachment I). Although manifest records show that these areas were generally purged of HW at least every thirty days, we cannot substantiate that HW were never accumulated for more than ninety days as plant records are quantitative, not qualitative. This is especially true for the time period between October, 1982 and April, 1984, when your office granted this facility Small Quantity Generator (SQG) status. The two west storage areas contained (at various times) one gondola of chassis black paint sludge (D008), and the eastern storage area contained drummed waste methylene chloride contaminated cleaner solvent (F002), and waste toluene (F005). The paint sludge was stored in a 30 cubic yard gondola in the western area from November, 1980 to October, 1982. The gondola was then moved to the eastern location in April, 1984. In April, 1986, the formulation of the paint was altered rendering the paint sludge non-hazardous. Attachment II is waste analysis results denoting the new paint sludge as non-hazardous.

Attachment III is the closure plan for closure of the three storage areas. This plan will be activated upon approval by your office. Once this closure is completed, this facility will revert to Generator only Status under RCRA.

Y.J. KIM/2

If you have any questions, please call Jim Nachtman at (313) 456-6915.

Many thanks for your cooperation.



R.L. Thornton
Plant Manager

cc: D.M. Spencer, EPA Reg. V
A.J. Howard, MDNR
J.B. Nachtman, GMT Env. Engr.



RECEIVED

MAY 16 1986

JMD - HJD
U.S. EPA, REGION V

April 27, 1986

Edith M. Ardiente, P.E.
Chief, Technical Programs Section
Waste Management Division
US EPA Region V
230 South Dearborn Street
Chicago, IL 60604

RECEIVED
MAY 16 1986
SOLID WASTE DIVISION
U.S. EPA, REGION V

RE: GMC Detroit Assembly Withdrawal of RCRA Part A
Application (MID 076 380 583) C TSD PA

Dear Ms. Ardiente,

On November 17, 1980, General Motors Chevrolet Division submitted to your office a Resource Conservation and Recovery Act (RCRA) Part "A" Permit application to generate and store hazardous wastes at our site on Piquette Street. On October 25, 1982, GM requested that the permit application be withdrawn because the plant's generation status was a Small Quantity Generator.

On April 11, 1984, we requested the renewal of our RCRA Part "A" permit application. At that time, changes in our plant processes determined that a permitted storage area would be the best method for compliance.

Since that time, several changes in the plant's processes have again necessitated the re-evaluation of our status. Generally, our waste minimization plan and our existing plant material handling procedures make a permitted storage area unnecessary. A rationale of existing waste generation volumes and the obsolete waste generation volumes found on the original RCRA Part "A" Permit Application are as follows.

There were two areas listed in the original Part "A" Permit application that stored (S01) containers of hazardous wastes. These areas consisted of the drum storage pad and the paint sludge gondola (Attachment II). The paint sludge characteristics have been altered by the use of a no lead paint, and certain solvent usage has been reduced as described below:

- The paint stripper used for cleaning our paint booths that contained methylene chloride has been discontinued. The volume of this material used in calendar year 1985 was 1800 gallons.

- The chassis black paint has been replaced with a no-lead paint. Therefore, the paint sludge (once recorded as waste code D008) now passes the Extraction Procedure test (40 CFR 261.24) and is no longer a hazardous waste by characteristic. The volume of this material used in 1985 was 101,500 pounds and 2900 gallons.
- The standard procedure for the remaining hazardous waste (waste purge thinner- waste code U220) allows for the waste to be removed from the plant in less than ninety days. The volume of this material used in 1985 was 605 gallons.

The treatment code found in the original permit (T01 - 200 gal per year of F007, F008, and F009) was for the plant's treatment of phosphating sludge. The sludge would be treated for hexavalent chromium and discharged to the city sewer system. This notification in the Part "A" Permit application was a protective filing. Since the treatment of sewer discharges regulated under the Clean Water Act are exempt under RCRA, this code should never have been included in the permit. Moreover, since February, 1986, the phosphate system has been removed from the plant and the work outsourced.

The only hazardous waste that will be generated at this plant will be waste toluene. A copy of our revised Notification of Hazardous Waste Activity is Attachment III. This material will be handled per the Generated requirements under 40 CFR 262. Since our plant is already compliant with both state and federal hazardous waste Generator regulations, a permit to store hazardous waste on site is not necessary. Therefore, please withdraw our Part "A" Permit Application.

If you have any questions, please call Jim Nachtman at (313) 456-6915.

Many thanks for your cooperation.



R. L. Thornton,
Plant Manager

JBN/s1

cc: D. M. Spencer, EPA Reg. V
A. J. Howard, MDNR

bcc: J. P. Chu, GM EAS
R.A. Simpson
L. J. Moody. GM Legal

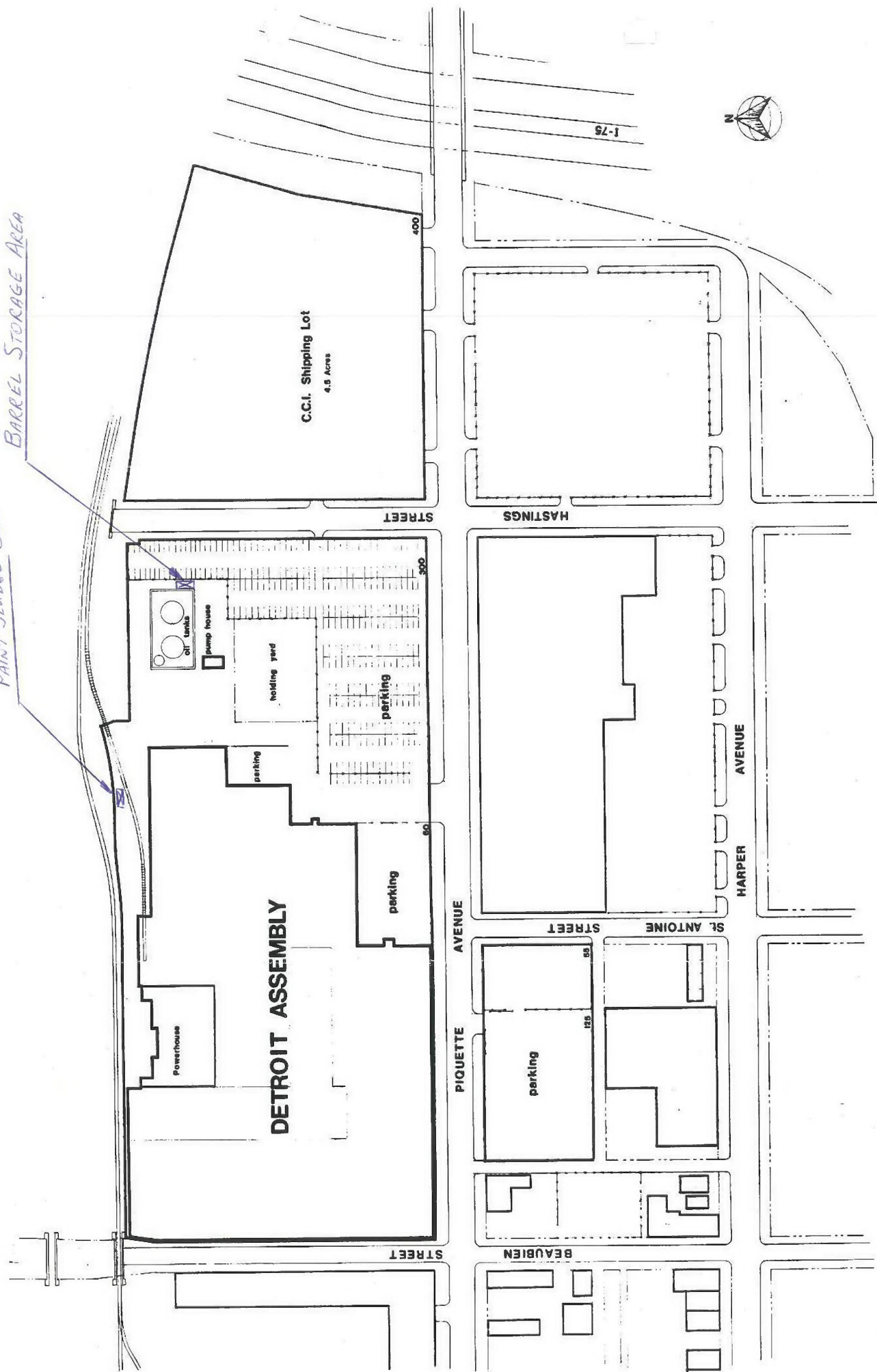
JBN/042461/s1



I-75

BARREL STORAGE AREA

PAINT SLUDGE BOX



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE:

5/19/86

SUBJECT: Installation Name

CNC - Cher.

Installation Address

Detroit Mich

EPA ID#

FROM: Oretha Edwards, AIS

TO: Technical Programs Section, M1 Unit

Attention:

Attached for your review is a copy of

Withdrawal of
Part A

for the above-referenced facility. PLEASE RETURN THIS FORM ALONG WITH ALL ATTACHED MATERIAL TO ME FOR FORWARDING TO AIS STAFF OR TO FILE.

Cover letter date

4-27-86

Rec'd in Region

Rec'd in AIS

5-16-86

assigned 5/20/86

Copy sent to

ACTION REQUIRED

REVIEWER'S SUMMARY

deny request as no indication that facility has or has not used over 90 day storage. Info. request letter drafted 4/10/86

PLEASE RETURN THIS FORM ALONG WITH ALL RELATED MATERIAL TO ORETHA EDWARDS, AIS



Andrea R. Schoenrock
Technical Services Section
Hazardous Waste Division
Michigan Department of Natural Resources
Steven T. Mason Building, Box 30028
Lansing, Michigan 48909

February 17, 1987

Re: GMC Detroit Assembly withdrawal of RCRA Part A Application (MID
076 380 583) 1, TSD, PA

Dear Ms. Schoenrock,

This letter is in response to your request of December 22, 1986, regarding the withdrawal of our Resource Conservation and Recovery Act (RCRA) Part A and Act 64 Construction permit application. Thank you for granting an extension to adequately respond to your Review comments.

Please amplify the comment in your letter that this closure procedure would not terminate interim status. Since this facility has no need to treat, store or dispose of hazardous waste, due to the small volume of waste toluene generated, GM has decided to operate as a generator facility only. We do not understand why closure would not relieve this facility of interim status per 40 CFR 262.10 or R299.9306

Enclosed is the additional information regarding your review comments, and a revised (as necessary) Closure plan.

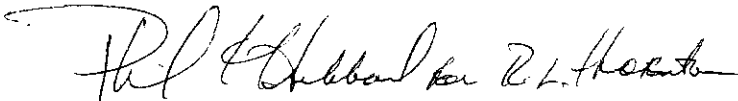
- 1.a **West Pad** - As noted on week 7 of the closure plan, the decontamination process will include decontamination scrub and/or water blast. Any hazardous material that would be washed off this pad would be the result of "de minimus" losses of material per 40 CFR 261.3(a)(2)(iv)(C). Therefore, the discharge of the washwater will be regulated by the city of Detroit sewer code. The only facility equipment that would have contamination is the slab itself (the gondola is the property of the waste hauler and has not been on the slab since October, 1982). There are no pipelines, appurtenances, tanks, excavation and/or hauling equipment to decontaminate. Sampling methods will be the same methods used by the facility to assure compliance to the city sewer code.
- b. **Center Pad** - The decontamination process for the West Pad would also apply to the central pad. This pad will remain in use as a storage pad for non-hazardous paint sludge waste.

- c. East Pad - The contaminated soil removal and subsequent soil analyses will be performed by an outside contractor that is familiar with state clean-up operations. The contractor will take whatever precautions are necessary to insure that the clean-up is performed in an environmentally sound manner and in accordance with applicable State and Federal regulations. After decontamination the drum racks will be removed to the manufacturing plant for use as raw material storage racks. The concrete walls around the oil tanks will remain in place to provide containment. The bare soil that remains in the oil tanks enclosure will be backfilled with virgin soil and a concrete containment area will be poured.
2. As mentioned in the closure plan, the SWM 846 method does include the analyses for organic compounds. To insure that closure is complete, Volatile Organic Analysis (VOAs) will be included in 25% of the lead analyses.
 3. GM Truck & Bus does not believe that borings into the concrete or the asphalt are in accord with the intention of the closure regulation, i.e. 40 CFR 264.111. Since the central pad is to continue in use, the borings themselves could be the cause of contaminants reaching the underlying soils. Also, analyses of the asphalt and concrete would not be indicative of contamination, as they both contain heavy metal and organic contaminants in their original material matrix (reference Handbook of Chemistry, Lange, Tenth Edition.). Since the pads were not the original containment structures, such as the pad under a waste pile, GM believes that the migration into the ground of waste materials is unlikely.
 4. No other hazardous waste constituents were stored in the storage areas.
 5. Soil borings will be made in the Eastern Storage area. Previous soil borings (attached) indicate that a clay lens in the area begins at approximately 4 feet. Therefore, to insure coverage, soil borings with analysis will be made at one foot intervals to a depth of four feet, and soil will be removed in one foot increments.
 6. Standard sampling protocol requires that time tables, test results, and weather conditions be recorded on the chain of custody form when samples are taken. GM will notify the contractor of these conditions. GM will also notify the state if there is precipitation during the closure process. The haul roads are not part of the storage area subject to closure requirements.
 7. The closure plan has been so amended.

8. The closure certification will include all support data, per your request.
- 1 Secondary containment will be provided in the areas as required.

If you have any questions, please call Jim Nachtman at (313) 456-6915.

Many thanks for your cooperation.

A handwritten signature in dark ink, appearing to read "R.L. Thornton". The signature is fluid and cursive, with a large initial "R" and "L".

R.L. Thornton
Plant Manager

cc.: D. M. Spencer, US EPA Region V

/rs

ATTACHMENT I

Closure Plan

Truck & Bus Detroit Assembly Plant

601 Piquette, Detroit, Michigan 48202

This closure plan is designed to close the storage areas at this plant to minimize the need for further maintenance and eliminate the possibility of escape of any hazardous wastes, waste constituents, leachates, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or the atmosphere. At all times during the closure process steps will be taken to prevent threats to human health and the environment, including compliance with all applicable interim status requirements (R299.9306(1)-(4)).

- 1.) Maximum Hazardous Waste Inventory - The following values show the maximum inventory of wastes that will be stored at any one time prior to closure.

Spent Toluene	300 gallons
Spent Methylene Chloride Cleaner	*
Paint Sludge (non-hazardous)	30 cubic yards (by volume)

* Plant use was discontinued in January, 1986

- 2.) Schedule for Closure - The final closure date cannot be established until approval from the Michigan DNR is received. Milestone dates are calculated from the date approval is received.

Week <1 Plant performs soil analyses around storage areas to determine background levels. Consideration will be given for background levels of contaminants occurring in urbanized areas. The two western storage areas will be analyzed for total lead (at least four samples each around each concrete slab). One of each sample lot will also be analyzed for Volatile Organic Compounds. The eastern storage area background samples will be analyzed for VDAs (at least four samples each around the concrete containment in areas not subject to contamination from the storage pad). An estimate of contamination depth will be made based upon waste type, contaminant mobility, operation practices and soil type.

Week 1 The Plant terminates the storage of HW activity.

Week 5 Removal of all HW off site for reclamation or disposal. (This is a standard procedure).

- Week 6 Render all extra drums empty per 40 CFR 261 and send same to off-site drum reclaimer.
- Week 7 Decontamination scrub and/or water blast concrete and asphalt slabs, deposit any residues into drums for transfer off-site. Analysis of washwater discharge to city to insure compliance to the city sewer code.
- Week 8 Begin sampling and analyses of the soils beneath the east storage area. Previous soil borings (attached) indicate that a clay lens in the area begins at approximately 4 feet. Therefore, to insure coverage, soil borings with analyses will be made at one foot intervals to a depth of four feet, and soil will be removed in one foot increments. Since the Grid interval is less than 20 feet, the site will have 9 sample stations.
- Week 11 Evaluation of soil analyses. The analyses performed will be identical to those used to establish the background levels. Possible contamination would be determined by using the Gosset Student T-test at the 95% confidence level. The samples will be analyzed for Volatile Organic compounds per US EPA Procedure SW 846. Removal and disposal of contaminated soil, if necessary. After the removal (if necessary) of contaminated soil, the area will be concreted over to provide containment for the oil tanks. Removal and disposal of contaminated soil, if necessary.
- Week 12 Verification of analyses, and certification of closure by an independent registered professional engineer.

3. Closure Costs - Maximum cost estimates for the closure of the three storage areas. These costs include a maximum waste inventory, certification, soil analyses, labor, HW disposal and transportation.

Spent Toluene	300 gallons	\$ 625
Paint Sludge	30 cubic yards	1,600
Soil Borings	39 borings	2,000
Soil Sampling/Analyses	26 Pb analyses	5,600
	17 VOA	4,250
	10 Sewer Code	3,000
Clean-up, Transportation		
/Disposal Contaminated Soil	10 cubic yards	1,100
Concrete Containment Pad		20,000
Certification		\$ 1,825
Total		<u>\$40,000</u>

CHEVROLET



Central Office

October 25, 1982

U.S. Environmental Protection Agency
230 Dearborn Street
Chicago, Illinois 60604

Gentlemen:

Subject: Part "A" Application Withdrawal
GMC, Chevrolet Detroit Assembly
601 Piquette Avenue
Detroit, Michigan 48202
MID076380583 G, T & D, PA

Pursuant to Section 122.15(a)(3)(i)(B), Consolidated Permit Program Regulations, Truck & Bus Manufacturing Division, GMC, Detroit Assembly Plant (formerly Chevrolet Motor Division) requests withdrawal of its Interim Status Permit for hazardous waste generation, treatment, and storage. Chevrolet Environmental Management Department continues to handle these functions for this plant.

Process Codes F007, F008, and F009 were changed to only include cyanide bearing wastes. The waste products of bonderite sludge residues do not contain cyanide and are not hazardous pursuant to Subpart C characteristics. Process Code F017, paint sludges, have been delisted from 40 CFR 261 as of January 16, 1981.

Detroit Assembly does utilize a paint stripper containing methylene chloride for maintenance. The amount of this spent solvent F002 generated at any one time is 1,683 pounds and is removed directly from the process into a tank truck for disposal. This limited quantity qualifies Detroit Assembly for Small Quantity Generator status of 40 CFR 261.5.

Since the Interim Status Permit has not been utilized, it is believed that no closure or post-closure plan need be submitted.

Please advise Mr. G. E. Calhoun of Chevrolet Central Office as to the EPA determination for the subject permit withdrawal.

Very truly yours,

ROBERT C. STEMPEL
Vice President, General Motors Corporation
General Manager, Chevrolet Motor Division

RAS/nrm
M/CH031

cc: Mr. R. E. Schrameck, MDNR

RECEIVED
11/10/82

RECEIVED

NOV 9 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

JUN 18 1986

5HS-JCK-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED P 557 099 020

R. L. Thornton
Plant Manager
GMC: Detroit Assembly Plant
31 Judson Street
Pontiac, Michigan 48058

RE: Part A Withdrawal
GMC: Detroit Assembly Plant
MID 076 380 583

Dear Mr. Thornton:

This letter is in response to correspondence received from your facility dated April 27, 1986 and a subsequent conversation with Jim Nachtman, of your staff, on June 3, 1986. The United States Environmental Protection Agency (U.S. EPA) is denying your request to withdraw your Part A Hazardous Waste Permit Application. Your request did not contain sufficient information to enable this office to concur with your determination and our review indicates that further clarification is necessary.

Several items requiring clarification were discussed with Mr. Nachtman and are summarized as follows:

1. Verification has not been submitted to assure that your facility has never accumulated hazardous waste on site for more than 90 days at any time from November 19, 1980, to the present. If at any time since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G. Correspondence from your facility indicates the desire for a permitted storage area in 1980 and 1984.
2. While U.S. EPA Hazardous Waste Nos. F017 and F018 were suspended from regulation in the January 16, 1981 Federal Register, your facility should have reexamined these wastes to determine if they exhibited characteristics of ignitability, corrosivity, reactivity, or EP toxicity, as defined in 40 CFR Part 261 Subpart C. Information received indicates that the chassis black paint is no longer classified as a D008 waste, but fails to state if other hazardous characteristics are present. Mr. Nachtman stated that this waste was collected in two areas when classified as D008 waste.

3. EPA Form 8700-12, "Notification of Hazardous Waste Activity", dated August 4, 1980, lists the Hazardous Waste No. F005. A second notification listing this waste is not necessary.

Please submit the requested information in writing, signed and certified by an authorized person in accordance with 40 CFR Part 270.11 (enclosed). We expect a response to this inquiry within 30 days of receipt of this letter.

Sincerely,

Y. J. Kim, Acting Chief
Technical Programs Section

cc: Al Howard/MDNR

SHS-JCK-13:WMD:SWB:TPS:MICHIGAN READ FILE:D.SPENCER:G.WORDS IN 6/05/86
CORR 6/10/86
FINAL 6/11/86

INIT. DATE	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	ML. CHIEF	MN/WI CHIEF	OH. CHIEF	TPS CHIEF	WMB CHIEF	WMD DIR
	<i>J.W.</i>	<i>YJK</i>			<i>ESS</i>			<i>CDL</i>		
	<i>6/11/86</i>	<i>6/11/86</i>			<i>6/12/86</i>			<i>6/13/86</i>		

Truck & Bus Group



Truck & Bus Group
Detroit Assembly Plant
General Motors Corporation
601 Piquette
Detroit, Michigan 48202

US Environmental Protection Agency
Region V
111 West Jackson Blvd.
Chicago, Illinois 80604

April 11, 1984

RECEIVED

Subject: Part "A" Permit Status Renewal

APR 23 1984

GM Truck and Bus Div.-Detroit Assembly
601 Piquette Ave.
Detroit, Michigan 48202
MID076380583 . SQG-2, PA-M

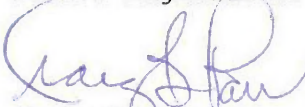
**WMD-RAIU
EPA, REGION V**

Mr. Joe Boyle

In October 1982 we requested the withdrawal of our Part A Permit (Small Quantity Generator), and this request was granted under section 3005 of the RCRA act.

Due to changes in our process we have found that this facility can no longer meet the Small Quantity Generator status. Therefore we are requesting renewal of our Part "A" permit status, because some months out of the year we exceed our limit, as a Small Quantity Generator.

If you have any questions, please contact Mr. William C. Wojciechowski Senior Engineer at (313) 556-6327


Craig B. Parr
Plant Manager

WCW/rs

cc: Ronald Skoog, Director
Department of Natural Resources

WASTE MANAGEMENT
BRANCH

RECEIVED
APR 20 1984



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

MAR 25 1983

Mr. Robert C. Stempel, Vice President
GMC Chevrolet
30007 Van Dyke Avenue
Warren, Michigan 48090

RE: Withdrawal of Part A
(Small Quantity Generator)
FACILITY NAME: GMC Chevrolet Detroit Assembly
USEPA ID NO.: MID 076 380 583

Dear Mr. Stempel:

This is to acknowledge that the United States Environmental Protection Agency (USEPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of October 25, 1982, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility qualifies for the small quantity generator exclusion as defined in 40 CFR Part 261.5. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time.

Please be advised that you must ensure that your waste is handled in accordance with 40 CFR Part 261.5(g) (enclosed); and applicable State and local requirements.

You will retain your USEPA Identification number; if you wish to have your identification withdrawn, please notify this Regional Office.

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Withdrawal of Part A (Small Quantity Generator)", in all telephone contacts and correspondence on this matter.

Sincerely yours,

A handwritten signature in cursive script, reading "Karl J. Klepitsch, Jr.".

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Robert D. Lund, Vice President
F. B. Quakenbush, Plant Engineer
MDNR
G. E. Calhoun



ENVIRONMENTAL PROTECTION AGENCY

REGION V

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

Robert C. Stempel, Vice President
~~Gmc Chevrolet Detroit Assembly~~
30007 Van Dyke Avenue
Warren, MI 48090

RE: Withdrawal of Part A
(Small Quantity Generator)

FACILITY NAME: ~~Gmc Chevrolet Detroit Assembly~~
USEPA ID NO.: MID 076 380 583

Dear Mr. Stempel:

This is to acknowledge that the United States Environmental Protection Agency (USEPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of October 25, 1982, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility qualifies for the small quantity generator exclusion as defined in 40 CFR Part 261.5. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time.

Please be advised that you must ensure that your waste is handled in accordance with 40 CFR Part 261.5(g) (enclosed), and applicable State and local requirements.

You will retain your USEPA Identification number; if you wish to have your identification withdrawn, please notify this Regional Office.

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Withdrawal of Part A (Small Quantity Generator)", in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Robert D. Lund, Vice President

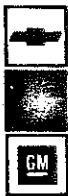
F.B. Quakenbush, Plant Engineer
Gmc Chevrolet Detroit Assembly
601 Piquette
Detroit, MI 48202

MANR

cc: Mr. G.E. Calhoun
above address

For
3/25/83

CHEVROLET



Central Office

November 3, 1982

Mr. Roy E. Schrameck, P.E.
District Engineer
Water Quality Division
Michigan Department of Natural Resources
9311 Groh Road
Grosse Isle, Michigan 48138

RECEIVED
NOV 8 1982
WATER QUALITY DIV.
DIST. I

Dear Mr. Schrameck:

Subject: MDNR Inspection
September 23, 1982
Detroit Assembly Plant
MID 076380583

The attached letter requesting withdrawal of the Detroit Assembly Plant Part "A" Application is in response to your letter of October 8, 1982.

Waste paint stripper solvent containing methylene chloride is classified as F002, not U080. The amount of this spent solvent generated at any one time is 1,683 pounds and is removed directly from the process into a tank truck for disposal. This limited quantity qualifies Detroit Assembly for Small Quantity Generator status of 40 CFR 261.5.

As a Small Quantity Generator, Detroit Assembly is not in violation of any 40 CFR Part 265 regulations.

Very truly yours,

G. E. CALHOUN, Staff Engineer
Environmental Management Systems
Manufacturing Facilities,
Research & Development

GEC/sc
Attachment
cc: ~~Ms. Susan Norton~~, MDNR

XC(2) to NOWARD

CHEVROLET



Central Office

October 25, 1982

U.S. Environmental Protection Agency
230 Dearborn Street
Chicago, Illinois 60604

Gentlemen:

Subject: Part "A" Application Withdrawal
GMC, Chevrolet Detroit Assembly
601 Piquette Avenue
Detroit, Michigan 48202
MID07638D583

Pursuant to Section 122.15(a)(3)(i)(B), Consolidated Permit Program Regulations, Truck & Bus Manufacturing Division, GMC, Detroit Assembly Plant (formerly Chevrolet Motor Division) requests withdrawal of its Interim Status Permit for hazardous waste generation, treatment, and storage. Chevrolet Environmental Management Department continues to handle these functions for this plant.

Process Codes F007, F00B, and F009 were changed to only include cyanide bearing wastes. The waste products of bonderite sludge residues do not contain cyanide and are not hazardous pursuant to Subpart C characteristics. Process Code F017, paint sludges, have been delisted from 40 CFR 261 as of January 16, 1981.

Detroit Assembly does utilize a paint stripper containing methylene chloride for maintenance. The amount of this spent solvent F002 generated at any one time is 1,683 pounds and is removed directly from the process into a tank truck for disposal. This limited quantity qualifies Detroit Assembly for Small Quantity Generator status of 40 CFR 261.5.

Since the Interim Status Permit has not been utilized, it is believed that no closure or post-closure plan need be submitted.

Please advise Mr. G. E. Calhoun of Chevrolet Central Office as to the EPA determination for the subject permit withdrawal.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'R. C. Stempel', written over a horizontal line.

ROBERT C. STEMPEL
Vice President, General Motors Corporation
General Manager, Chevrolet Motor Division

RAS/nrm
M/CH031

cc: Mr. R. E. Schrameck, MDNR

345

FORM <div style="font-size: 2em; font-weight: bold;">1</div>		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:5%;">6</td> <td style="width:5%;">7</td> <td style="width:5%;">8</td> <td style="width:5%;">9</td> <td style="width:5%;">10</td> <td style="width:5%;">11</td> <td style="width:5%;">12</td> <td style="width:5%;">13</td> <td style="width:5%;">14</td> <td style="width:5%;">15</td> </tr> <tr> <td>F</td> <td>M</td> <td>I</td> <td>D</td> <td>0</td> <td>7</td> <td>6</td> <td>3</td> <td>8</td> <td>0</td> </tr> <tr> <td>5</td> <td>8</td> <td>3</td> <td>3</td> <td>D</td> <td colspan="5"></td> </tr> </table>	6	7	8	9	10	11	12	13	14	15	F	M	I	D	0	7	6	3	8	0	5	8	3	3	D					
6	7	8	9	10	11	12	13	14	15																								
F	M	I	D	0	7	6	3	8	0																								
5	8	3	3	D																													
II. POLLUTANT CHARACTERISTICS <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms. </div>		GENERAL INSTRUCTIONS <p>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</p>																															

PLEASE PLACE LABEL IN THIS SPACE

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

III. NAME OF FACILITY	<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> 1 SKIP GMC CHEVROLET DETROIT ASSEMBLY </div> </div>
------------------------------	---

IV. FACILITY CONTACT	B. PHONE (area code & no.)
<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> 2 QUAKENBUSH, F. B. PLANT ENGINEER </div> </div>	<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> 3 1 3 5 5 6 6 3 2 5 </div> </div>

V. FACILITY MAILING ADDRESS			
A. STREET OR P.O. BOX			
<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> 3 601 PIQUETTE </div> </div>			
B. CITY OR TOWN		C. STATE	D. ZIP CODE
<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> 4 DETROIT </div> </div>		<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> MI 4 8 2 0 2 </div> </div>	

VI. FACILITY LOCATION			
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> 5 601 PIQUETTE </div> </div>			
B. COUNTY NAME		C. CITY OR TOWN	
<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> 6 WAYNE </div> </div>		<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> DETROIT MI 4 8 2 0 2 1 6 3 </div> </div>	

NOV 18 1980

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND														
C	7	3	7	1	1	(specify)					C	7	(specify)											
15	16	17	18	19	Motor Vehicles and Car Bodies										15	16	17	18	19					
C. THIRD										D. FOURTH														
C	7	(specify)									C	7	(specify)											
15	16	17	18	19											15	16	17	18	19					

VIII. OPERATOR INFORMATION

A. NAME																									B. Is the name listed in Item VIII-A also the owner?																																																												
C	8	G	M	C	.	C	H	E	V	R	O	L	E	T	.	D	E	T	R	O	I	T	.	A	S	S	E	M	B	L	Y	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																																																					
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																									D. PHONE (area code & no.)																																																												
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE																									C A 3 1 3 5 5 6 6 3 2 5																																																												
E. STREET OR P.O. BOX																																																																																					
601 PIQUETTE																																																																																					
F. CITY OR TOWN																									G. STATE					H. ZIP CODE					IX. INDIAN LAND																																																		
DETROIT																									MI					48202					Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO																																																		
13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100																																																																																					

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)												
C	9	N	N/A								C	9	P	N/A								
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24			
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)												
C	9	U	N/A								C	9	2	K	7	0	9	2	(specify)			
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24	Local Air Permit		
C. RCRA (Hazardous Wastes)										E. OTHER (specify)												
C	9	R	N/A								C	9	2	A	3	5	6	6	(specify)			
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24	Local Air Permit		

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

Assembly of Truck Chassis

F9: A
51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)										B. SIGNATURE										C. DATE SIGNED									
Robert D. Lund Vice President, General Motors Corp. General Manager, Chevrolet Motor Div.																				November 17, 1990									

COMMENTS FOR OFFICIAL USE ONLY

C																																																																																																				
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100															

FORM 3 RCRA

EPA

HAZARDOUS WASTE PERMIT APPLICATION

U.S. ENVIRONMENTAL PROTECTION AGENCY
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

8	M	I	D	0	7	6	3	8	0	5	8	3	1
---	---	---	---	---	---	---	---	---	---	---	---	---	---

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete item 1 above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
JECTION WELL AND FILL	D79	GALLONS OR LITERS			
	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	G
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)			1. AMOUNT	2. UNIT OF MEASURE (enter code)
X-1	S02	200	G	5			
X-2	T03	20	U	6			
1	S01	120000000	G	7			
	T01	20000	U	8			
3				9			
4				10			

III. PROCESSES (continued)C. SPACE FOR ADDITIONAL PROCESS CODES OR DESCRIBING OTHER PROCESSES (code "T04" FOR EACH PROCESS ENTERED HERE
INCLUDE DESIGN CAPACITY.**IV. DESCRIPTION OF HAZARDOUS WASTES****A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.**B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.**C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:****For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
							1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
X-1	K	0	5	4	900	P	T	0	3	D	8	0				
X-2	D	0	0	2	400	P	T	0	3	D	8	0				
X-3	D	0	0	1	100	P	T	0	3	D	8	0				
X-4	D	0	0	2												included with above

included with above

345

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W M I D 0 7 6 3 8 0 5 8 3 3 1													W DUP 3 2 DUP												
DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)			B. ESTIMATED ANNUAL QUANTITY OF WASTE			C. UNIT OF MEASURE (enter code)		D. PROCESSES																
									1. PROCESS CODES (enter)												2. PROCESS DESCRIPTION (if a code is not entered in D(1))				
1	F	0	1	7	15,600	000	P	S	0	1															
2	F	0	0	7	200	000	P	S	0	1	T	0	1												
3	F	0	0	8																					Included with above
4	F	0	0	9																					Included with above
5																									
6																									
7																									
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25																									
26																									

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	M	I	D	0	7	6	3	8	0	5	8	3	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6: A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6: A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

4	2	2	2	0	9	N
50	55	57	58	59	60	

0	8	3	0	3	5	3	W
72	73	74	75	76	77	78	

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E	15	16	55	56	57	58	59	60	61	62	63	64	65
---	---	----	----	----	----	----	----	----	----	----	----	----	----	----

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

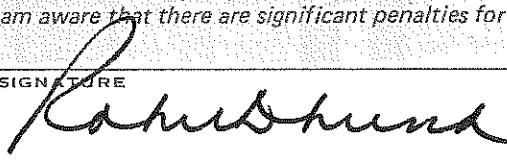
C	F	15	16	45	46	47	48	49	50	51	52	53	54	55
---	---	----	----	----	----	----	----	----	----	----	----	----	----	----

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)
Robert D. Lund
Vice President, General Motors Corp.
General Manager, Chevrolet Motor Div.

B. SIGNATURE



C. DATE SIGNED

November 17, 1980

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

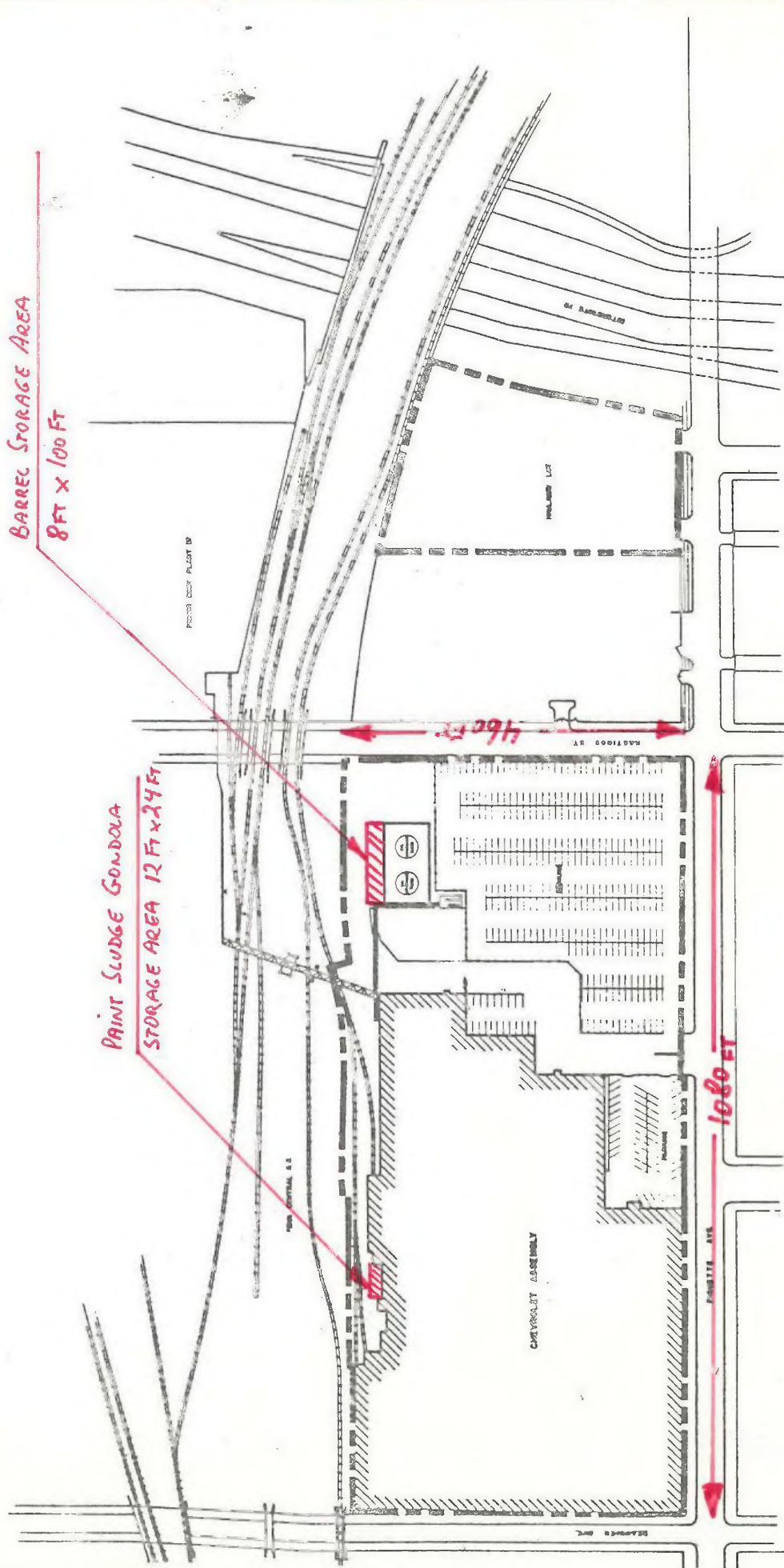
A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

345

V. FACILITY DRAWING (see page 4)



DETROIT ASSEMBLY
12.57 Acres
11-1-77

DATE	11-1-77
BY	DETROIT ASSEMBLY
CHECKED BY	
APPROVED BY	
CHEVROLET MOTOR DIVISION DIV OF GENERAL MOTORS CORP.	



LEGEND
Hatched area CHEVROLET PROPERTY

CHEVROLET



Detroit Assembly Plant

Form 3 RCRA

EPA I.D.# MID-076380583

VI PHOTOGRAPHS

345

BARREL STORAGE AREA - CHEVROLET



DETROIT ASSEMBLY PLANT 11/12/80

PAINT SLUDGE GONDOLA



CHEVROLET DETROIT ASSEMBLY 11/12/80

STATE OF MICHIGAN



WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director
Water Quality Division
911 Groh Road
Grosse Ile, Michigan 48138

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
CARL T. JOHNSON
E.M. LAITALA
HILARY F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

November 12, 1982

Mr. G. E. Calhoun, Staff Engineer
Environmental Management Systems
Manufacturing Facilities, Research and Development
Chevrolet Division, General Motors Corporation
30007 Van Dyke Avenue
Warren, Michigan 48090

Re: MID076380583

Dear Mr. Calhoun:

Thank you for your letter of November 3, 1982. You indicate the review your staff has made of the Detroit Assembly Plant's status concerning RCRA and the request to U.S.E.P.A. for withdrawal of your Part A permit application and recognition as a small quantity generator. The stated rationale seems reasonable, as does the listing of methylene chloride as F002 rather than U080.

Thank you for your efforts in clarifying this matter. If you have any questions concerning hazardous waste management, please contact us at (313) 675-0860.

Yours truly,

WATER QUALITY DIVISION

Roy E. Schrameck

Roy E. Schrameck, P.E.
District Engineer

Susan Norton

By: Susan Norton
Water Quality Specialist

RES:SN/sc

cc: James Fox
Alan Howard, OHWM (2)



34J

EPA Regional Administrator
EPA Regional Address (Address same as
that used to mail EPA Form 8700-12)

Re: Notification of Hazardous Waste
Activity for GM Unit Name
Mailing Address
Facility Location
EPA ID No. MID076380583

Dear Sir:

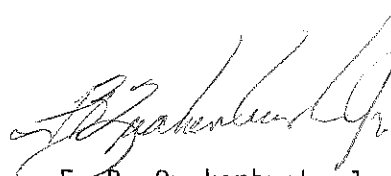
Subsequent to our submission to your office of
EPA Form 8700-12 on August 18, 1980, it has come to our
attention that certain information was inadvertently omitted
from our Notification of Hazardous Waste Activity (EPA Form
8700-12).

Pursuant to advice General Motors received from
EPA personnel in Washington, we are requesting that the EPA
Form 8700-12 submitted for the facility identified above be
modified to reflect the hazardous waste activities shown below.
Please note that this facility has been assigned an EPA
identification number.

The following information was inadvertently omitted:

Part 261 Subpart D Hazardous Waste List - F009.

Please incorporate this additional information on EPA Form 8700-12 for this facility. If you have any questions, please contact F. B. Quakenbush, Jr. at (313)-556-6325.



F. B. Quakenbush, Jr.
Plant Engineer

FBQ/dm

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

- 1 Non-handler
- 2 Small Quantity Generator
- 4 Exempt
- 5 Beneficial Use
- 9 Closed

Please print/type with blue type (12 characters per inch)

II. GENERATOR'S EPA I.D. NUMBER

T/A C

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
M	I	T	D	0	7	6	3	8	0	5	8	3			

91TSD

This Installation's Non-Regulated Status is Expected to Apply:

- ☐ For 1983 Only
- ☐ Permanently
- ☐ Other _____

III. NAME OF INSTALLATION

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30		
G	M	C																													

IV. INSTALLATION MAILING ADDRESS

15 16 45

Street or P.O. Box

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

15 16 45

Street or Route number

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

15 16 45

Name (last and first)

3 1 3 1 5 5 6 1 6 3 2 5

46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Wm. C. Wojciechowski Senior Engineer *Wojciechowski* 2-20-84

Print/Type Name Title Signature of Authorized Representative Date Signed

Tear out here

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

G	M	I	D	0	7	6	3	8	0	5	8	3	1
1	2											13	14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Perto-Chem Processing, Inc.

X. FACILITY'S EPA I.D. NO.

F	M	I	D	9	8	0	6	1	5	2	9	8
16												28

XI. FACILITY ADDRESS

421 Lycaste
Detroit, Michigan 48214

XII. TRANSPORTATION SERVICES USED

Inland Waters Pollution Control Inc.
4544 Webster
Ecorse, Michigan 48229
MID00820365Michigan Pumping Services
2619 Superior St.
Trenton, Michigan 48183
MID010871234

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Spent Paint Solvents Containing Toluene	0 8	38 39 42	1 1 4 1 2	P
2	Ignitable Spent Solvent Used in Paint Line Cleaning	0 8	D 0 0 1	1 7 4 3 0	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

X111. Shipped under DOT 07 Per Table in CFR

Generator Biennial Hazardous Waste Report for 1983 (cont.)

VIII. GENERATOR'S EPA I.D. NO.

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

XIII. WASTE IDENTIFICATION									
Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure			
1	1	Atlas Roof Tar	018	D101011 35 38 39 42	12191710	P			
2	2	Paint Sludge	08	D101011	45112	P			
3	3	Caustic Water-Boothrol LX	018	D101012	164715	P			
4	4								
5	5								
6	6								
7	7								
8	8								
9	9								
10	10								
11	11								
12	12								

XIV. COMMENTS (enter information by section number—see instructions)

X111. Line item #1 & 2 1983 Generated-Stored on site less than 90 Days as of December 31, 1983.

Line item #3 unused material on hand, no longer required for operations at this location.

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Explain your non-regulated status in the space below.

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. ☐

II. FACILITY EPA I.D. NUMBER

T/A C

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15
M I D 0 7 6 3 8 0 5 8 3 1

This Facility's Non-Regulated Status is Expected to Apply:

- ☐ For 1983 Only ☐ Permanently
☐ Other (explain in comment section)

END ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF FACILITY

30 69
G M C D E T R O I T A S S E M B L Y

IV. FACILITY MAILING ADDRESS

15 16 45
6 0 1 P i q u e t t e

Street or P.O. Box

15 16 41 42 47 51
D E T R O I T M I 4 8 2 0 2

City or Town

State Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

15 16 45
Street or Route number

15 16 41 42 47 51
City or Town State Zip Code

VI. FACILITY CONTACT

15 16 45
W O J C I E C H O W S K I W I L L I A M

Name (last and first)

46 55
3 1 3 - 5 5 6 - 6 3 2 5

Phone No. (area code & no.)

VII. COST ESTIMATES FOR FACILITIES

\$ 16 19 22 25 28 31
3 2 5 0

A. Cost Estimate for Facility Closure

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Wm. Wojciechowski

Senior Engineer

Print/Type Name

Title

Signature of Authorized Representative

Date Signed

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

IX. FACILITY'S EPA I.D. NO.

T/A C

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

X. GENERATOR'S EPA I.D. NO.

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

GMC Detroit Assembly

ON-SITE ☒

XII. GENERATOR ADDRESS

601 Piquette
Detroit, Michigan 48202

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01	AMOUNT OF WASTE	UOM	S02	AMOUNT OF WASTE	UOM	S03	AMOUNT OF WASTE	UOM
S04	AMOUNT OF WASTE	UOM	S05	AMOUNT OF WASTE	UOM			

XIV. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
1	Caustic Water-Degreaser 4221 -Boothrol LX	D 0 0 2 33 36 37 40	S 0 1	1 6 4 7 5	P
2	Spent Paint Sludge	D 1 0 1 1 41 44 45 48 49 51 52	S 0 1	4 5 1 2	P
3	Atlas Roof Tar	D 1 0 1 1	S 0 1		P
4	Spent Paint Solvents Containing Toluene	F 1 0 1 5	S 0 1	1 1 4 1 2	P
5	Ignitable Spent Solvent used in Paint Line Cleaning	D 1 0 1 1	S 0 1	1 7 4 3 0	P
6					
7					
8					
9					
10					
11					
12					

XV. COMMENTS (enter information by section number—see instructions)

YELLOW



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-JCK-13

AUG 29 1986

Alan J. Howard, Chief
Technical Services Section
Hazardous Waste Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

RE: Closure Plan

GMC: Detroit Assembly
MID 076 380 583

Dear Mr. Howard:

Enclosed is/are ONE (1) copy(s) of a closure plan for the referenced facility. Please perform a technical evaluation of the plan, and provide us your comments by September 30, 1986.

If you have any questions on the closure plan, please contact Diane M. Spencer of my staff, at (312) 886-3740.

Sincerely,

Karl E. Bremer

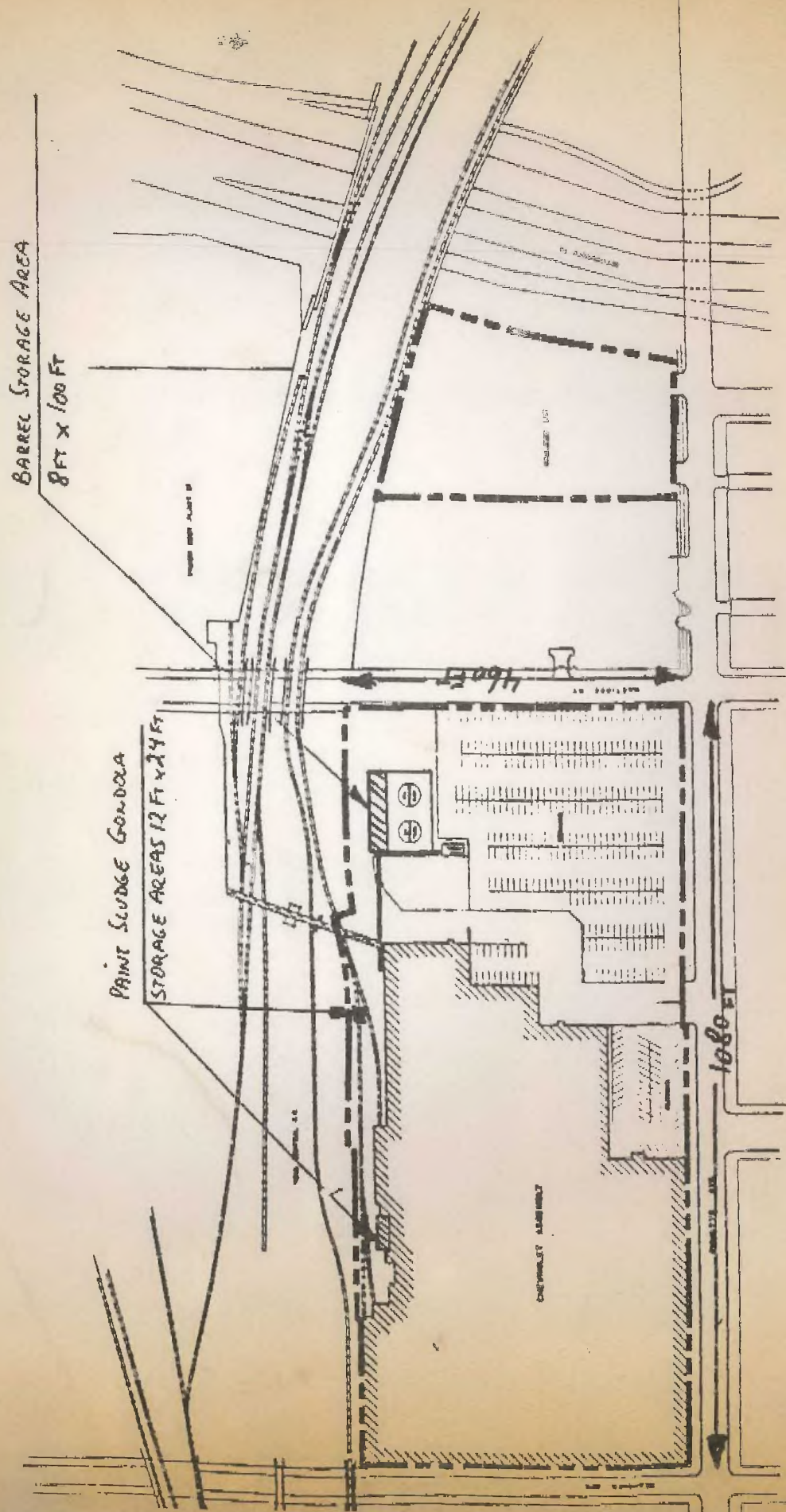
Karl E. Bremer, Chief
Technical Programs Section

Enclosure(s)

cc: Mary Higgins

INIT. DATE	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	TPS CHIEF	WMB CHIEF	WMD DIR
	<i>AW</i>	<i>AW</i>			<i>AW</i>					
	<i>8/25</i>	<i>8/25</i>			<i>8/25</i>					

SFL-5

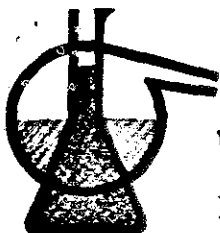


DETROIT ASSEMBLY
(17.57 ACRES)
11-1-77

1	DETROIT ASSEMBLY	17.57 ACRES
2	PAINT SLUDGE GONDOLA	
3	STORAGE AREAS	
4	BARREL STORAGE AREA	
5	PUMP HOUSE	
6	TANKS	
7	ROAD	
8	RAILROAD	
9	WATERWAY	
10	UTILITY LINES	



NOT TO SCALE
FOR INFORMATION PURPOSES ONLY



WASTE COMPLIANCE SERVICES

12680 Beech Daly Road • Detroit, Michigan 48239 • 313-255-9600

REPORT OF ANALYSIS

November 1, 1985

SAMPLE**SUBMITTED BY:**Inland Waters Pollution Control
ATTN: JENNIFER BAKER**DATE RECEIVED:**

October 25, 1985

PROJECT NUMBER:

P-2529

REPORT NUMBER:

R-2529

ANALYSIS REQUESTED:As, Ba, Cd, Cr, Pb, Hg, Se, Ag, Cu, CN⁻, and
Zn analysis on the EP Extract.**METHOD OF ANALYSIS:**EPA test procedures, Federal Register Vol. 45
Part 261.**RESULTS:** Expressed in ug/ml (ppm) on the sample extract labeled:
Chassis Black sludge 10/23/85 (S-7439).**HAZARDOUS**

<u>WASTE NUMBER</u>	<u>CONTAMINANT</u>	<u>EP TOXIC LEVELS</u>	<u>SAMPLE RESULT (EXTRACT)</u>
D004	Arsenic-As	5	< 0.050
D005	Barium-Ba	100	0.35
D006	Cadmium-Cd	1	< 0.003
D007	Chromium-Cr	5	< 0.005
D008	Lead-Pb	5	< 0.050
D009	Mercury-Hg	0.2	< 0.002
D010	Selenium-Se	1	< 0.050
D011	Silver-Ag	5	< 0.003
001D	Copper-Cu	100	0.015
002D	Cyanide-CN ⁻	20	< 0.02
003D	Zinc-Zn	500	< 0.005

1. Ignitability --- Non-ignitable (Flash Point 140°F+)
2. Reactivity ---- Non-reactive
3. Corrosivity ---- Non-corrosive
4. pH -- 6.8

WASTE COMPLIANCE SERVICESAnalysis by Ann Nerzwicki
Ann Nerzwicki
Chemist

ATTACHMENT III

CLOSURE PLAN

Truck & Bus Detroit Assembly Plant
601 Piquette, Detroit MI 48202

- 1.) Maximum Hazardous Waste Inventory - The following values show the maximum inventory of wastes that will be stored at any one time.

Spent Toluene	300 gallons
Spent Methylene Chloride Cleaner	*
Paint Sludge	30 cubic yards

* Plant use was discontinued in February, 1986.

- 2.) Schedule for Closure - The final closure date cannot be established until approval from the necessary state and federal agencies is received. Milestone dates are calculated from the date approval is received to close the storage areas.

Week <1 Plant performs soil analysis¹ around storage areas to determine background levels. Consideration will be given for background levels of lead occurring in urbanized areas. The two western storage areas will be analyzed for total lead (at least four samples each around each concrete slab). The eastern storage area background samples will be analyzed for methylene chloride and toluene (at least four samples each around the concrete containment "uncontaminated" area). An estimate of contamination depth will be made based upon waste type, contaminant mobility, operation practices and soil type.

Week 1 The Plant terminates the storage of HW activity .

Week 5 Removal of all HW off-site for reclamation or disposal.

¹"Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" EPA SW-846.

- Week 6 Render all extra drums empty per 40 CFR 261 and send same to off-site drum reclaimer.
- Week 7 Decontamination scrub and/or water blast concrete slab, pump any residues into drums for transfer off-site.
- Week 8 Begin sampling and analyses of the soils beneath the storage areas. The analysis performed will be identical to those used to establish the background levels. Possible contamination would be determined by using the Gosset Student T-test at the 95% confidence level. Since the Grid Interval for all cases is less than 20 feet, each site will have 9 sample stations.
- Week 11 Evaluation of soil analysis, removal and disposal of contaminated soil, if necessary.
- Week 12 Verification of analysis, and certification of closure by an independent registered professional engineer.
- 3.) Closure Costs - Maximum cost estimates for the closure of the three storage areas. These costs include certification, soil analysis, labor, HW disposal and transportation.

Spent Toluene	300 gallons	\$ 625
Paint Sludge	30 cu. yards	1,600
Soil Borings	39 borings	2,000
Soil Sampling/Analysis	26 Pb analysis	5,600
	13 methylene chloride	3,250
	13 toluene	3,250
Clean-up, Transportation		
Disposal Contaminated Soil	5 cu. yards	550
Certification		1,000
		<hr/>
Total		\$ 17,725



MAR 26 1987

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5HE-12

MID 076 380 583

General Motors Corporation
General Motors Building
3044 W. Grand Boulevard
Detroit, Michigan 48202

Re: RCRA Financial Responsibility

Dear Owner/Operator:

On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the United States Environmental Protection Agency (U.S. EPA) to administer a hazardous waste program in lieu of the Federal program. As a result of final authorization, Michigan is required to enforce the provisions of the Resource Conservation and Recovery Act (RCRA). One of these provisions (40 CFR Part 265, Subpart H) requires all hazardous waste facilities to demonstrate financial responsibility for liability coverage and closure/post-closure care.

To implement this aspect of authorization, financial documents must be written to satisfy the requirements of the Michigan Administrative Code 1985 AACs, Part 7, which is the Michigan equivalent of 40 CFR Part 265, Subpart H. This letter is to notify you that your financial test should be updated and sent to the Director of the Michigan Department of Natural Resources within 90 days after the close of your fiscal year.

If you have any questions or desire additional information, please contact Ms. Sharon Johnson at (312) 886-4581 or Ronald Brown at (312) 353-7921.

Sincerely yours,

Wm. E. Muno

William E. Muno, Chief
RCRA Enforcement Section

cc: John Bohunsky, MDNR

U.S. EPA ID #: MID000721 ✓

GMC ROCHESTER PROD DIV COOPERSVILL*
2100 BURLINGAME
AND RAPIDS MI 49501

U.S. EPA ID #: MID003912920 ✓

GMC WHS & DIST DIV DRAYTON PLAINS
6060 W BRISTOL ROAD
FLINT MI 48554

U.S. EPA ID #: MID980700827 ✓

GMC OLDSMOBILE DIV PLTS 2 & 3
P O BOX 30061
LANSING MI 48909

U.S. EPA ID #: MID017079625 ✓

GMC ROCHESTER PROD DIV WYOMING PLT
2100 BURLINGAME
GRAND RAPIDS MI 49501

U.S. EPA ID #: MID005356902 ✓

GMC TRUCK & BUS GROUP
660 S BLVD E
PONTIAC MI 48053

U.S. EPA ID #: MID003906773 ✓

GMC WHS & DIST DIV FLINT
6060 W BRISTDL ROAD
FLINT MI 48554

U.S. EPA ID #: MID00535680 ✓

GMC FISHER BODY DIV COLDWATER RD
1245 E CULWATER RD
FLINT MI 48559

U.S. EPA ID #: MID005356787 ✓

GMC FISHER BODY DIV FORT ST
6307 WEST FORT STREET
DETROIT MI 48209

U.S. EPA ID #: MID000718544 ✓

GMC GMAD LAKE ORION TWP PLT
PO BOX 347
LAKE ORION MI 48035

U.S. EPA ID #: MID000724740 ✓

GMC HYDRA-MATIC DIV
ONE HYDRA-MATIC DRIVE
THREE RIVERS MI 49093

U.S. EPA ID #: MID005356704 ✓

GMC CADILLAC MOTOR CAR CLARK PLT
2860 CLARK ST
DETROIT MI 48232

U.S. EPA ID #: MID000718551 ✓

GMC HYDRA-MATIC DIV THREE RIVERS P*
ONE HYDRA-MATIC DR
THREE RIVERS MI 49093

U.S. EPA ID #: MID005356688 ✓

GMC CHEVRDLET BAY CITY
100 FITZGERALD ST
BAY CITY MI 48706

U.S. EPA ID #: MID005356894 ✓

GMC OLDSMOBILE DIV PLT 1
P O BOX 30061
LANSING MI 48909

U.S. EPA ID #: MID086744802 ✓

GMC CHEVROLET DETROIT GEAR AND AXLE
1840 HOLBROOK AVE
DETROIT MI 48212

U.S. EPA ID #: MID082220757 ✓

GMC PROVING GROUND MILFORD
HICKORY RIDGE & GM ROADS
MILFORD MI 48042

U.S. EPA ID #: MID005356621 ✓

GMC CHEVROLET LIVONIA
13000 ECKLES RD
LIVONIA MI 48151

U.S. EPA ID #: MID980568836 /

GMC TRUCK & COACH DIV PONTIAC WEST
660 S BLVD E
PONTIAC MI 48053

U.S. EPA ID #: MID005356803 ✓

GMC DETROIT DIESEL ALLISON DIV REQ*
13400 WEST OUTER DR
ETROIT MI 48239

U.S. EPA ID #: MID980700843 ✓

GMC OLDSMOBILE DIV PLT 5
P O BOX 30061
LANSING MI 48909

U.S. EPA ID #: MID980568 3 ✓

GMC AC SPARK PLUG DIV DAVISON ENG
1300 NORTH DORT HIGHWAY
FLINT MI 48556

U.S. EPA ID #: MID005356647 ✓

GMC AC SPARK PLUG DIV DORT HWY
1300 N DORT HWY
FLINT MI 48556

U.S. EPA ID #: MID980568570 ✓

GMC AC SPARK PLUG DIV WASTE TRMT
1300 N DORT HIGHWAY
FLINT MI 48556

U.S. EPA ID #: MID005356795

GMC ASSEMBLY DIV
2625 TYLER ROAD
YPSILANTI MI 48197 ✓

U.S. EPA ID #: MID005356696 ✓

GMC CENTRAL FOUNDRY DIV SAG MAL IR*
77 W CENTER ST
SAGINAW MI 48605

U.S. EPA ID #: MID076380583 ✓

GMC CHEVROLET DETROIT ASSEMBLY
601 PIQUETTE
DETROIT MI 48202

U.S. EPA ID #: MID005356654 ✓

GMC CHEVROLET FLINT MFG
300 NORTH CHEVROLET AVENUE
FLINT MI 48555

U.S. EPA ID MID0041793340 ✓

GMC CHEVROLET SAGINAW CASTING & PA*
2100 VETERANS MEMORIAL PARKWAY
SAGINAW MI 48601

U.S. EPA ID #: MID000809905 ✓

GMC DETROIT DIESEL ALLISON ROMULUS*
36680 ECKSE RD
ROMULUS MI 48174

U.S. EPA ID #: MID005356712 ✓

GMC BUICK MOTOR DIV
902 E HAMILTON ST BLDG 85
FLINT MI 48550

U.S. EPA ID #: MID084571256 ✓

GMC CHEVROLET ADRIAN MFG
1450 E BEECHER ST
ADRIAN MI 49221

U.S. EPA ID #: MID020105565 ✓

GMC CHEVROLET DETROIT FORGE
8435 ST AUBIN
DETROIT MI 48212

U.S. EPA ID #: MID005356951 ✓

GMC CHEVROLET FLINT VAN SLYKE COMP*
G-3248 VAN SLYKE RD
FLINT MI 48552

U.S. EPA ID #: MID005356845 ✓

GMC CHEVROLET SAGINAW MFG
2328 EAST GENESEE AVE
SAGINAW MI 48605

DTW217888327

O: WMD ✓
cc: RF



General Motors Corporation

RECEIVED

APR 04 1983

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Mr. Valdas V. Adamkus
Regional Administrator
U.S. EPA Region V
230 S. Dearborn
Chicago, IL 60604

Dear Mr. Adamkus:

I am the chief financial officer of General Motors Corporation, 3044 West Grand Boulevard, Detroit, Michigan 48202. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and non-sudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See Attachments A and B.

The firm identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, liability coverage for both sudden and non-sudden accidental occurrences at the following facilities owned or operated by the following subsidiaries of the firm: None.

1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: See Attachments A and B.

2. The firm identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: See Attachment B.

RECEIVED

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility: None.

This firm is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1987.

ALTERNATIVE I
(\$ In Millions)

1. Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	\$	59.1
2. Amount of annual aggregate liability coverage to be demonstrated	\$	8.0
3. Sum of lines 1 and 2	\$	67.1
*4. Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)	\$	54,196.8
*5. Tangible net worth	\$	28,038.7
*6. Net worth	\$	33,225.1
*7. Current assets	\$	39,771.5
*8. Current liabilities	\$	25,528.2
9. Net working capital (line 7 minus line 8)	\$	14,243.3
*10. The sum of net income plus depreciation, depletion, and amortization	\$	9,662.9
*11. Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	\$	68,168.1
12. Is line 5 at least \$10 million?	YES	NO
13. Is line 5 at least 6 times line 3?	X	—
14. Is line 9 at least 6 times line 3?	X	—
*15. Are at least 90% of assets located in the U.S.? If not complete line 16.	—	X
16. Is line 11 at least 6 times line 3?	X	—
17. Is line 4 divided by line 6 less than 2.0?	X	—
18. Is line 10 divided by line 4 greater than 0.1?	X	—
19. Is line 7 divided by line 8 greater than 1.5?	X	—

ORIGINAL COPY OF LETTER AND ENCLOSURE (1987 ANNUAL REPORT) ARE FILED
AT:

OHD 020 632 998
GMC BOC LORDSTOWN ASSEMBLY
LORDSTOWN, OHIO

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility: None.

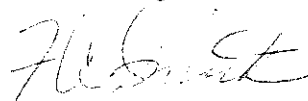
This firm is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1987.

ALTERNATIVE I
(\$ In Millions)

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*5. Tangible net worth	\$	28,038.7
*6. Net worth	\$	33,225.1
*7. Current assets	\$	39,771.5
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*10. The sum of net income plus depreciation, depletion, and amortization	\$	9,662.9
*11. Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	\$	68,168.1
12. Is line 5 at least \$10 million?	YES	NO
13. Is line 5 at least 6 times line 3?	X	—
14. Is line 9 at least 6 times line 3?	X	—
*15. Are at least 90% of assets located in the U.S.? If not complete line 16.	X	—
16. Is line 11 at least 6 times line 3?	X	X
17. Is line 4 divided by line 6 less than 2.0?	X	—
18. Is line 10 divided by line 4 greater than 0.1?	X	—
19. Is line 7 divided by line 8 greater than 1.5?	X	—

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below..

A handwritten signature in dark ink, appearing to read 'F. A. Smith', is written over the typed name.

F. A. Smith
Executive Vice President
March 30, 1988

1114 Avenue of the Americas
New York, New York 10036-7778
(212) 790-0500
International Telex: 66262
ITT Telex: 4995707

General Motors Corporation:

We have examined the Consolidated Balance Sheet of General Motors Corporation (the "Corporation") and consolidated subsidiaries as of December 31, 1987 and the related Statements of Consolidated Income and Changes in Consolidated Financial Position for the year then ended, and have issued our opinion thereon dated February 8, 1988. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. We have not performed any auditing procedures beyond the date of our opinion on the 1987 financial statements; accordingly, this report is based on our knowledge as of that date and should be read with that understanding.

At your request, we have performed the procedures enumerated below with respect to the accompanying letter from Mr. F. A. Smith to the Regional Administrator, U.S. EPA Region V, dated March 30, 1988. It is understood that this report is solely for filing with the addressee of the accompanying letter, and is not to be used for any other purpose. The procedures that we performed are summarized as follows:

1. We compared the amounts included in items 6, 7, 8 and 11 under the caption Alternative I in the letter referred to above with the corresponding amounts in the financial statements referred to in the first paragraph.
2. We recomputed from, or reconciled to, the financial statements referred to in the first paragraph the information included in items 4, 5, 10 and 15 under the caption Alternative I in the letter referred to above.

Because the procedures referred to in the preceding paragraph were not sufficient to constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the information or amounts listed under the caption Alternative I in the aforementioned letter. In performing the procedures referred to above, however, no matters came to our attention that caused us to believe that the information or amounts included in items 4, 5, 6, 7, 8, 10, 11 and 15 should be adjusted.

Deloitte Haskins + Sells

March 30, 1988

ORIGINAL COPY OF LETTER AND ENCLOSURE (1987 ANNUAL REPORT) ARE FILED
AT:

OHD 020 632 998
GMC BOC LORDSTOWN ASSEMBLY
LORDSTOWN, OHIO

10 Copies

O: PMD.
CC: All Divisions



RECEIVED
SEP 10 1991

Truck & Bus Group
General Motors Corporation
31 Judson Street
Pontiac, Michigan 48058

U.S. ENVIRONMENTAL PROTECTION AGENCY
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR
September 9, 1991

Mr. Valdas Admakus
EPA Regional Administrator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED

SEP 09 1991

U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

Re: Delegation of Signatory Authority
EPA Environmental Programs

Dear Mr. Adamakus:

The attached documents are notification that the position of Plant Manager has been designated as the duly authorized representative for these facilities of General Motors Corporation, as provided for under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the U.S. EPA Environmental Permit Regulations.

Please distribute copies to the appropriate departments which administer the relevant regulations.

If you have any questions, please contact this office at (313) 456-4423.

Sincerely,

B. F. Rogers JR.
Superintendent
Central Plant Engineering

ALD/BFR/sjc

Attachment: Delegation of Signatory Authority documents by
Mr. G. D. Briggs.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Plant Manager - Detroit Assembly ✓
 2

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at Detroit Assembly, located in Detroit, Michigan is hereby designated as my Duly Authorized Representative. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
 (NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
 Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
 Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
 Act (40 CFR 403).

In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
 Vice President and Group
 Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
 State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Plant Manager - Flint Assembly

3

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at Flint Assembly, located in Flint, Michigan is hereby designated as my Duly Authorized Representative. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
(NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
Act (40 CFR 403).

In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
Vice President and Group
Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Plant Manager - Flint Metal Fabricating

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at Flint Metal Fabricating, located in Flint, Michigan is hereby designated as my Duly Authorized Representative. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System (NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water Act (40 CFR 403).

In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
 Vice President and Group
 Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
 State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Plant Manager - Fort Wayne Assembly

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at Fort Wayne Assembly, located in Fort Wayne, Indiana is hereby designated as my Duly Authorized Representative. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
 (NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
 Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
 Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
 Act (40 CFR 403).

In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
 Vice President and Group
 Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
 State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Plant Manager - Indianapolis Manufacturing

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at Indianapolis Manufacturing, located in Indianapolis, Indiana is hereby designated as my Duly Authorized Representative. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
(NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
Act (40 CFR 403).

In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
Vice President and Group
Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Plant Manager - Janesville Assembly

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at Janesville Assembly, located in Janesville, Wisconsin is hereby designated as my Duly Authorized Representative. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
(NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
Act (40 CFR 403).

In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
Vice President and Group
Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Plant Manager - Moraine Assembly

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at Moraine Assembly, located in Dayton, Ohio is hereby designated as my Duly Authorized Representative. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
(NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
Act (40 CFR 403).

In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
Vice President and Group
Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Plant Manager-Pontiac Central Manufacturing & Assembly

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at Pontiac Central Manufacturing & Assembly, located in Pontiac, Michigan is hereby designated as my Duly Authorized Representative. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
(NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
Act (40 CFR 403).

In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
Vice President and Group
Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Plant Manager - Pontiac East Assembly

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at Pontiac East Assembly, located in Pontiac, Michigan is hereby designated as my Duly Authorized Representative. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
(NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
Act (40 CFR 403).

In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
Vice President and Group
Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Plant Manager - Pontiac West Assembly

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Plant Manager at Pontiac West Assembly, located in Pontiac, Michigan is hereby designated as my Duly Authorized Representative. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
(NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
Act (40 CFR 403).

In the absence of the Plant Manager due to illness, vacation or similar cause, the Acting Plant Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
Vice President and Group
Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Truck Center Manager - Chicago Truck Center

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Truck Center Manager at Chicago Truck Center, located in Chicago, Illinois is hereby designated as my Duly Authorized Representative. As such, the Truck Center Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
(NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
Act (40 CFR 403).

In the absence of the Truck Center Manager due to illness, vacation or similar cause, the Acting Truck Center Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
Vice President and Group
Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Truck Center Manager - Cleveland Truck Center

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Truck Center Manager at Cleveland Truck Center, located in Cleveland, Ohio is hereby designated as my Duly Authorized Representative. As such, the Truck Center Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
(NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
Act (40 CFR 403).

In the absence of the Truck Center Manager due to illness, vacation or similar cause, the Acting Truck Center Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
Vice President and Group
Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Truck Center Manager - Detroit Truck Center

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Truck Center Manager at Detroit Truck Center, located in Detroit, Michigan is hereby designated as my Duly Authorized Representative. As such, the Truck Center Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
(NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
Act (40 CFR 403).

In the absence of the Truck Center Manager due to illness, vacation or similar cause, the Acting Truck Center Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
Vice President and Group
Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991
Under EPA Environmental Programs

TO: Truck Center Manager - Pontiac Truck Center

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Truck Center Manager at Pontiac Truck Center, located in Pontiac, Michigan is hereby designated as my Duly Authorized Representative. As such, the Truck Center Manager is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
(NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
Act (40 CFR 403).

In the absence of the Truck Center Manager due to illness, vacation or similar cause, the Acting Truck Center Manager is designated to sign any reports or information requests required under these programs.

G.D. Briggs
Vice President and Group
Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
State Director



SUBJECT: Delegation of Signatory Authority DATE: July 22, 1991 -
Under EPA Environmental Programs

TO: Executive Engineer - Administration and Planning

As provided under 40 CFR 122.22, 144.32, 270.11 and 403.12 of the Federal Regulations, the position of Executive Engineer is hereby designated as my Duly Authorized Representative. As such, the Executive Engineer is authorized to sign all reports required by permits, and other information requested by the Control Authority, regarding the following environmental programs at this facility:

National Pollutant Discharge Elimination System
(NPDES) of the Clean Water Act (40 CFR 122).

Underground Injection Control (UIC) Program of the
Safe Drinking Water Act (40 CFR 144).

Hazardous Waste Management Program of the Resource
Conservation and Recovery Act (RCRA)(40 CFR 270).

National Pretreatment Program of the Clean Water
Act (40 CFR 403).

In the absence of the Executive Engineer due to illness, vacation or similar cause, the Acting Executive Engineer is designated to sign any reports or information requests required under these programs.

G.D. Briggs
Vice President and Group
Director of Operations

GDB:JBN:sc

cc: EPA Regional Administrator
State Director

Truck & Bus Group



RECEIVED

MAY 03 1989

WASTE MANAGEMENT DIV.

GENERAL MOTORS TRUCK & BUS GROUP

DETROIT ASSEMBLY
601 PIQUETTE AVE.
DETROIT, MICHIGAN
(313) 974-3553

Truck & Bus Group
Detroit Assembly Plant
General Motors Corporation
601 Piquette
Detroit, Michigan 48202

RECEIVED

MAY 03 1989

ENV. RESPONSE DIV.
DETROIT DIST. OFC.

ORGANIC SOLVENT MANAGEMENT PLAN

(40CFR 403.12) (WPC 84-3)

Pg. 1-2

POLLUTION INCIDENT PREVENTION PLAN

(City of Detroit Ordinance 23-86 Section 56-3-59.1)

SPILL PREVENTION CONTROL AND COUNTER MEASURE

(40CFR 112)

Pg. 3-4

HAZARDOUS WASTE MANAGEMENT CONTINGENCY PLAN

(40CFR 264.50)


Pg. 4-8

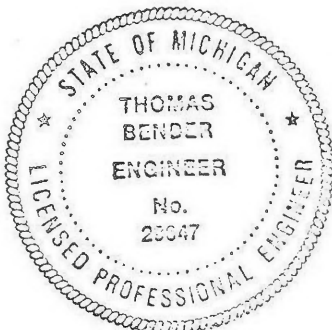
APPENDIX

"I certify that the information provided in this document is to the best of my knowledge true and that the accidental spill measures described in this document will be implemented as described." "This certification is made on behalf of General Motors."


Tommy E. Henderson

"I certify that the spill prevention and control equipment installed by the facility will provide adequate protection from accidental spills when used properly."


T.G. Bender P.E.



ECP

4-20-89

Truck & Bus Group



Truck & Bus Group
Detroit Assembly Plant
General Motors Corporation
601 Piquette
Detroit, Michigan 48202

Date: December 20, 1984

U.S. EPA Region V
EPA Regional Administrator
P.O. Box 7861
Chicago, Illinois 60680

MID 076380583 G, TSD, PA

SUBJECT: Delegation of Signatory Authority
EPA Environmental Permit Programs

Gentlemen:

The attached document is notification that the position of Plant Manager has been designated as the duly authorized representative for this facility of General Motors Corporation, as provided for under 40 CFR 122.22, 144.32, 233.6, and 270.11 of the U.S. EPA Environmental Permit Regulations.

Please distribute copies to the appropriate departments which administer the relevant regulations.

If you have any questions, please contact this office.
(313) 556-6325.

Sincerely,

Wm. C. Wojciechowski
Sr. Engineer
Plant Engineering

(WCW/rs)

Attachment: Delegation of Signatory Authority document,
by Mr. P. J. Coletta, dated December 11, 1984.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RECEIVED
DEC 27 1984

WMD-RAIU
EPA, REGION V



December 11, 1984

SUBJECT: Delegation of Signatory Authority
EPA Environmental Permit Programs

TO: Plant Manager - Detroit Assembly

As provided under 40 CFR 122.22, 144.32, 233.6, and 270.11 of the "Environmental Permit Regulations", the position of Plant Manager is hereby designated as the duly authorized representative for General Motors Corporation, Truck & Bus Group Operations - Detroit Assembly.

As such, the Plant Manager is authorized to sign all permit applications, all reports required by permits, and other information requested by EPA or a corresponding state or municipal agency, submitted for the following programs:

1. National Pollutant Discharge Elimination System (NPDES) of the Clean Water Act (40 CFR 122).
2. Underground Injection Control Program of the Safe Drinking Water Act (40 CFR 144).
3. Dredge or Fill (404) Program of the Clean Water Act (40 CFR 233).
4. Hazardous Waste Permit Program of the Resource Conservation and Recovery Act (40 CFR 270).

In the absence of the individual occupying the designated position due to vacation, illness, or other reasons, the individual temporarily responsible for the operation of the facility or activity is the duly authorized representative.

P. J. Coletta
Vice President and
Group Director of Operations

RAS/mak

cc: EPA Regional Administrator
State Director

RAS84/7242/mak

*925
3-28-84
Code R*

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
ROBERT HOLMES
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
~~XXXXXX TANNER XXXXXXXX~~
Ronald Skoog, Director

Hazardous Waste Division
9311 Groh Road
Grosse Ile, Michigan 48138

February 2, 1984

Mr. William C. Wojciechowski
Senior Engineer - Plant Engineering
Truck & Bus Group
Detroit Assembly Plant
General Motors Corporation
601 Piquette
Detroit, Michigan 48202

Re: MID 076380583

Dear Mr. Wojciechowski:

Thank you for your prompt response to my January 3 letter. The revised training records and contingency plan submitted on January 18 meet the 40 CFR 265.16 and 265 Subpart D requirements.

The facility should now be in full compliance with the RCRA generator standards. Compliance will be evaluated in an upcoming inspection.

Feel free to contact me if you have questions concerning waste management.

Sincerely,

William E. Stone

William E. Stone
Water Quality Specialist
Compliance Section
Hazardous Waste Division
(313) 675-0860

WES/sc

cc: Ken Burda (3), w/o plan

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
ROBERT HOLMES
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

XXHOWARDXXATTNERXXHARDXX

Ronald Skoog, Director

Hazardous Waste Division

9311 Groh Road

Grosse Ile, Michigan 48138

January 3, 1984

Mr. William C. Wojciechowski
Senior Engineer - Plant Engineering
Truck & Bus Group
Detroit Assembly Plant
General Motors Corporation
601 Piquette
Detroit, Michigan 48202

Re: MID 076380583

Dear Mr. Wojciechowski:

I have reviewed your December 15 submittals. The training records and contingency plan were provided in response to my November 8 RCRA deficiency letter.

The training records should be expanded to include the dates each individual received training and a detailed written description of the training received. For example, the training file must contain an outline or narrative of subjects covered in your "Hazardous Materials & Waste Disposal Workshop" and your "Hazardous Waste Management Seminar". As a reminder, the training must be reviewed annually. The training file will be reviewed in a future inspection to determine compliance with 40 CFR 265.16.

The contingency plan is lacking in a number of areas. Statements must be added to paragraph B.IV.c that indicate actions the emergency coordinator will take if the environment or human health are threatened outside the facility. The coordinator must determine if evacuation off site may be necessary and also contact the state and EPA and appropriate local agencies.

Mr. William C. Wojciechowski
January 3, 1984
Page 2

The following agencies, at least, must be in an immediate notification list in that paragraph: fire, police, hospital, a clean-up contractor, the National Response Center (800-424-8802) and the DNR (800-292-4706). The paragraph must also include that the coordinator will submit a written report detailing any incident that required implementing the contingency plan to the EPA Regional Administrator and the DNR within 15 days of the incident.

There is no documentation in the plan of company arrangements with local emergency agencies or that the plan has been submitted to those organizations. If no arrangements are necessary or if the agencies refuse the plan the reasons must be documented.

The plan must list the names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator. You may wish to use the Hazardous Waste Committee as the source for your coordinator and alternates. Your records indicate these individuals have received hazardous waste training while there is no such training indicated for the security personnel. The coordinator must be familiar with the characteristics of the wastes, the location of the records, of all operation and activities and so on. If you choose to change coordinators the responsibilities assigned the security staff in your current plan could be delegated to them by the coordinator in the new plan.

The plan must be modified to include the items discussed above and to meet the 40 CFR 265 Subpart D requirements. The amended plan should be submitted to this office by January 30, 1984.

WES
The plant lost interm status on March 25, 1983 when EPA withdrew "Part A" of your hazardous waste permit application. The withdrawal was at company request. Hazardous waste can not be stored or treated at the plant, however, waste generated on-site may be accumulated in containers for 90 days or less. The weekly inspection log for the drum storage included in your submittals is not required by the RCRA generator standards. It is an excellent idea to maintain the log, however. If you choose to keep the log I recommend that columns be added to track the 90 day limit and the total number of containers in accumulation.

Thank you for your cooperation. Please contact me if you have any questions.

Sincerely,

William E. Stone

William E. Stone
Water Quality Specialist
Compliance Section
Hazardous Waste Division
(313) 675-0860

WES/sc
cc: Ken Burda (3)

Truck & Bus Group



Truck & Bus Group
Detroit Assembly Plant
General Motors Corporation
601 Piquette
Detroit, Michigan 48202

RECEIVED

DEC 16 1983

WATER QUALITY DIV.
DIST. I

Certified Mail

Date: December 15, 1983

Mr. William E. Stone
Water Quality Specialist
Compliance Section
Hazardous Waste Division
9311 Groh Road
Grosse Ile, Michigan 48138

Dear Mr. Stone

I am submitting a copy of the Contingency
Plan and Personnel Training Records for Detroit Assembly.

Thank you for your cooperation. If you have any questions,
contact me at (313) 556-6327

Sincerely,

Wm. C. Wojciechowski
Senior Engineer
Plant Engineering

WCW/rs

cc: Ken Burba (3) with out enclosures

985
12-28-83
Status 3
Code 7

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
ROBERT HOLMES
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

~~HOWARD A. TANNER, Director~~

Ronald Skoog, Director

Hazardous Waste Division
9311 Groh Road
Grosse Ile, Michigan 48138

November 8, 1983

CERTIFIED MAIL

Mr. James Fox, Plant Engineer
GMC Chevrolet Detroit Assembly
601 Piquette
Detroit, Michigan 48202

Re: MID 076380583

Dear Mr. Fox:

On October 11, 1983, your facility was inspected to determine compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

The facility was inspected in September 1982 as a TSD and found to be in violation of a number of interim status standards. The company's reply to an October 8, 1982 deficiency letter was that the facility was a small quantity generator meeting the 40 CFR 261.5 special requirements and not further regulated.

The recent inspection found the plant to be generating and accumulating hazardous waste and in violation of the following RCRA generator standards.

- 1). No records of hazardous waste training for facility personnel were available. 40 CFR 262.34(a)(4) and 265.16
- 2). A contingency plan meeting the 40 CFR 265.51 and 265.56 requirements was not available on site or at local emergency agencies. 40 CFR 265.

Mr. James Fox
November 8, 1983
Page 2

Please submit copies of the records and plan to this office by November 30, 1983.

Thank you for your cooperation. Contact me at (313) 675-0860 if you have any questions.

Sincerely,

William E. Stone

William E. Stone
Water Quality Specialist
Compliance Section
Hazardous Waste Division

WES/sc
cc: Ken Burda (3)

Truck & Bus Group



Truck & Bus Group
Detroit Assembly Plant
General Motors Corporation
601 Piquette
Detroit, Michigan 48202

Date: November 29, 1983

U.S. EPA Region V
EPA Regional Administrator
P.O. Box 7861
Chicago, Illinois 60680

RECEIVED

MID074380583 PA-M, NRS 2 DEC 06 1983

Delegation of Authority of Sign
Permit Applications
EPA Permit Programs.

WASTE MANAGEMENT BRANCH
EPA REGION V

Gentlemen:

The attached document is notification that the position of Plant Manager has been designated as the duly authorized representative for this facility of General Motors Corporation, as provided for under 40 CER 122.22, 144.32, 233.6, and 270.11 of the U.S. EPA Environmental Permit Regulations.

Please distribute copies to the appropriate departments which administer the relevant regulations.

If you have any questions, please contact this office.
(313)556-6325

Sincerely,

Wm. C. Wojciechowski
Sr. Engineer
Plant Engineering

(WCW/rs)

Attachment: Delegation of Authority document,
by Mr. R. L. McKee, dated October 11, 1983

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

RECEIVED
12/06/83



October 11, 1983

SUBJECT: Delegation of Authority to Sign
Permit Applications under
EPA Permit Programs

TO: Plant Manager - Detroit Assembly

As provided under 40 CFR 122.22, 144.32, 233.6, and 270.11 of the "Environmental Permit Regulations", the position of Plant Manager is hereby designated as my duly authorized representative for GM Truck & Bus - Detroit Assembly Plant.

As such, the Plant Manager is authorized to sign all permit applications, all reports required by permits, and other information requested by EPA or a corresponding state or municipal agency, submitted for the following programs:

1. National Pollutant Discharge Elimination System (NPDES) of the Clean Water Act (40 CFR 122)
2. Underground Injection Control Program of the Safe Drinking Water Act (40 CFR 144)
3. Dredge or Fill (404) Program of the Clean Water Act (40 CFR 233)
4. Hazardous Waste Permit Program of the Resource Conservation and Recovery Act (40 CFR 270)

In the absence of the individual occupying the designated position due to vacation, illness, or other reasons, the individual temporarily responsible for the operation of the facility or activity is my duly authorized representative.

R. L. Mc Kee, General Manager
GM Truck & Bus Manufacturing Division

RAS/mak

cc: EPA Regional Administrator
State Director

RCRA Inspection Report

EPA Identification Number: M I D 0 7 6 3 8 0 5 8 3

Installation Name: GMC Chevrolet Detroit Assembly

Location Address: 601 Piquette

City: Detroit State: Mi 48202

Date of inspection: 10/11/83 Time of inspection (from) 9:30a (to) 12 noon

Person(s) interviewed	Title	Telephone
<u>James Fox</u>	<u>Plant Engineer</u>	<u>313) 556-6327</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

Inspector(s)	Agency/Title	Telephone
<u>William E. Stone</u>	<u>MIDNR-HWD/wgs</u>	<u>313) 675-0860</u>

Installation Activity (mark only one box)

Inspection Form(s)

- | | |
|--|------|
| <input type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation | A |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation) | A |
| <input type="checkbox"/> Generation and Transportation | B, C |
| <input checked="" type="checkbox"/> Generation only | B |
| <input type="checkbox"/> Transportation only | C |

cc: Ken Burda (3)
Company

INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	<u>X</u>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.		<u>1</u>		<u>of 1,400 gal of F005 26 Drums</u>
(3) Do the manifest forms examined contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements) 262.21	<u>X</u>			
a. Manifest document number?	<u>X</u>			
b. Name, mailing address, telephone number, and EPA ID number of generator?	<u>X</u>			
c. Name and EPA ID number of transporter(s)?	<u>X</u>			
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<u>X</u>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>			
g. Required certification?	<u>X</u>			
h. Required signatures?	<u>X</u>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>None</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>NA</u>				

cc: Ken Burda (3)
Company

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<u>X</u>	___	___	_____
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	<u>X</u>	___	___	_____
(3) If required, are placards available to transporter? 262.33	___	___	<u>X</u>	_____
** (4) Pre-shipment Accumulation:				
** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.				
a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	<u>X</u>	___	___	_____
i. Is each container clearly marked with the date on which the period of accumulation began?	<u>X</u>	___	___	_____
ii. Have more than 90 days elapsed since the dates marked?	___	<u>X</u>	___	_____
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	<u>X</u>	___	___	_____
iv. Are containers in good condition?	<u>X</u>	___	___	_____
v. Are containers compatible with waste in them?	<u>X</u>	___	___	_____
vi. Are containers managed to prevent leaks?	<u>X</u>	___	___	_____
vii. Are containers stored closed?	<u>X</u>	___	___	_____
viii. Are containers inspected weekly for leaks and defects?	<u>X</u>	___	___	_____
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	<u>X</u>	___	___	_____

Yes No NI Remarks

- x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) NA
- xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? NA
- b. Is hazardous waste accumulated in tanks?
If no, skip to c. 262.34 (January 11, 1982 revision) X
- i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision) /
- ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192 /
- iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? /
- iv. Do continuous feed systems have a waste-feed cutoff? /
- v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193 /
- vi. Are required daily and weekly inspections done? 265.194 /
- vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198 /
- viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199 /

Yes No NI Remarks

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers?

_____ X _____

- d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

No training - no records

- i. Job Titles?
- ii. Job Descriptions?
- iii. Description of training?
- iv. Records of training?
- v. Did personnel receive the required training by 5-19-81?
- vi. Do new personnel receive required training within six months?
- vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training?

_____ X _____

_____ X _____

_____ X _____

_____ X _____

_____ X _____

_____ X _____

_____ X _____

- e. Preparedness and Prevention 265. Subpart C

- i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31

_____ X _____

Yes No NI Remarks

ii. If required, does this facility have the following equipment: 265.32

Internal communications or alarm systems?	<u>X</u>	___	___	___
Telephone or 2-way Radios at the scene of operations?	<u>X</u>	___	___	___
Portable fire <u>extinguishers</u> , fire control, <u>spill control</u> equipment and decontamination equipment?	<u>X</u>	___	___	___

Indicate the volume of water and/or foam available for fire control:

Municipal & 15000 gal water tower

iii. Testing and Maintenance of Emergency Equipment: 265.33

Has the owner or operator established testing and maintenance procedures for emergency equipment?	<u>X</u>	___	___	___
---	----------	-----	-----	-----

Is emergency equipment maintained in operable condition?	<u>X</u>	___	___	___
--	----------	-----	-----	-----

iv. Has owner/operator provided immediate access to internal alarms (if needed)?	<u>X</u>	___	___	___
--	----------	-----	-----	-----

v. Is there adequate aisle space for unobstructed movement?	<u>X</u>	___	___	___
---	----------	-----	-----	-----

vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	___	<u>X</u>	___	___
--	-----	----------	-----	-----

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52	___	<u>X</u>	___	___
--	-----	----------	-----	-----

No plan

	Yes	No	NI	Remarks
ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?		X		
iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.		X		
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?		X		
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)		X		
vi. Are copies of the Contingency Plan available at site and local emergency organizations?		X		
vii. Is the facility emergency coordinator identified?		X		
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?				
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?				
x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?				

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

Yes No NI Remarks

- (1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40

X _____

Section E: INTERNATIDNAL SHIPMENTS (Part 262 Subpart E)
262.50

- (1) Has the installation imported or exported hazardous waste? If "no", skip a and b.

_____ X _____

a. Exporting Hazardous Waste, has a generator:

i. Notified the Administrator in writing?

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

iii. Met the Manifest requirements?

b. Importing Hazardous Waste, has the generator met the manifest requirements?

remarks: The facility assembles truck chassis. It was inspected in 9/82 as a storage and generation facility. The inspection found that the only hazardous waste was spent cold stripper (methylene chloride). A number of violations were found and a deficiency letter was sent. The company replied that it was a small quantity generator.

This ~~inspection~~ inspection found that the company has changed cold stripper. The stripper does not need to be replaced so that waste stream has been eliminated. However, they also generate a waste solvent (toluene), F005. It is used to flush the paint lines. It is accumulated in 55 gal. drums. The last manifest indicated a shipment of 1400 gal, ^{26 drums,} well over 1,000 kg

manifests (Act 136) also indicate three nonhazardous waste streams: waste oil (1/month), paint residue (2/month) and lime sludge (2/yr.).

There were at least 6 drums of F005 in accumulation at the time of inspection.

#1067

RCRA Inspection Report

EPA Identification Number: M I D 0 7 6 3 8 0 5 8 3

Installation Name: GM/C CHEVROLET DETROIT ASSEMBLY

Location Address: 601 PIQUETTE

City: DETROIT

State: MICHIGAN 1 48202

Date of inspection: SEPT. 23, 1982 Time of inspection (from) 10:00 A.M. (to) 3:00 P.M.

Person(s) interviewed	Title	Telephone
<u>MR. JAMES FOX</u>	<u>SR. ENGINEER</u>	<u>313 556-6327</u>
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency/Title	Telephone
<u>SUSAN NORTON</u>	<u>MICH. DEPT. OF NATURAL RESOURCES - WATER QUALITY DIVISION</u>	<u>313-675-0860</u>
_____	_____	_____

Installation Activity (mark only one box) Inspection Form(s)

- | | |
|---|-------------|
| <input checked="" type="checkbox"/> <u>Treatment/Storage/Disposal</u> per 40 CFR 265.1 and/or <u>Generation and/or Transportation</u> | <u>A</u> |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation) | <u>A</u> |
| <input type="checkbox"/> Generation and Transportation | <u>B, C</u> |
| <input type="checkbox"/> Generation only | <u>B</u> |
| <input type="checkbox"/> Transportation only | <u>C</u> |

RECEIVED
OCT 13 1982
ACT 61

REMARKS:

FACILITY PRODUCES CHASSIS (FRAME, ENGINE, WHEELS, & TRANSMISSIONS) FOR MOTOR HOMES AND SMALL COMMERCIAL TRUCKS (SIZE OF A "UPS" TRUCK). MOST OF ACTIVITY IS ASSEMBLY - PAINTING OF CHASSIS IS ONLY "NON-ASSEMBLY" ACTIVITY, ONLY 1 PRODUCTION SHIFT ACTIVE, FOLLOWED BY 1 CLEAN-UP SHIFT.

FACILITY'S PART A APPLICATION OF 1980 HAS LISTING OF F007, F008, & F009, BUT NO U080 (SEE BELOW) WASTE LISTED AS F007, F008, & F009 IS A "BONDERITE" PROCESS WASTE - I.E., A WASH OF IRON PHOSPHATE RINSE OF CHASSIS PARTS TO PREPARE THEM FOR PAINTING.

THERE ARE NO ^{ELECTRO-}PLATING BATHS AT THE FACILITY; NO CYANIDES ARE USED OR GENERATED. THE WASTE DOES NOT CONTAIN ANY METALS ON EP TOXICITY LIST. THE BONDERITE SLUDGE HAS BEEN RE-ANALYZED BY THE COMPANY AND HAS NO PART 261.20 SUBPART C CHARACTERISTICS. THERE WAS NO OBSERVED REASON TO CONSIDER THIS MATERIAL HAZARDOUS.

THE ONLY HAZ WASTE REGULATED BY RCRA AT THIS PLANT IS U080, METHYLENE CHLORIDE. FACILITY IS BEING TRANSFERRED FROM 'CHEVROLET DIV.' TO 'WORLDWIDE TRUCK & COACH' DIVISION OF GM/C A NEW DIVISION.

150-225 PEOPLE ARE EMPLOYED AT THE FACILITY.

PLEASE SEE OTHER SIDE OF SHEET

REMARKS, CONTINUED:

MR. FOX ADVISED ME THAT ALTHOUGH THE FACILITY FUNCTIONS AS SIMPLY A GENERATOR (AND VERY PROBABLY A SMALL-QUANTITY GENERATOR AT THAT), CHEVROLET DIVISION ENVIRONMENTAL STAFF WISH TO MAINTAIN ITS INTERIM STATUS. HOWEVER, CHEVROLET'S LEGAL PERSONNEL HOLD THE OPINION THAT THE FACILITY CAN FUNCTION AS A GENERATOR ONLY, WITH INTERIM STATUS, PROVIDED IT MEETS GENERATOR REQUIREMENTS ONLY — NOT THE FULL COMPLEMENT OF REQUIREMENTS FOR INTERIM STATUS. G.M. CORPORATION'S AUDITORS, ON THE OTHER HAND, REVIEWED THE PLANT'S COMPLIANCE WITH RCRA ABOUT A YEAR AGO, AND DID NOT SHARE CHEVY DIVISION'S LEGAL POINT OF VIEW.

LETTER: TO: JAMES FOX
W/REPORT

CC: F.B. QUAREN BUSH

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

<u>Permit application process(es) (EPA Form 3510-3)</u>	<u>Inspection Form A section(s)</u>
---	-------------------------------------

S01 <input checked="" type="checkbox"/> storage in containers	I
S02 <input type="checkbox"/> storage in tanks	J
T01 <input checked="" type="checkbox"/> treatment in tanks	J
S04 <input type="checkbox"/> storage in surface impoundment	K,F
T02 <input type="checkbox"/> treatment in surface impoundment	K,F
DB3 <input type="checkbox"/> disposal in surface impoundment	K,F
S03 <input type="checkbox"/> storage in waste pile	L
DB1 <input type="checkbox"/> disposal by land application	M,F
DB0 <input type="checkbox"/> disposal in landfill	N,F
T03 <input type="checkbox"/> treatment by incineration	O/P
T04 <input type="checkbox"/> treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR ☒

TRANSPORTER ☐

APPENDIX GN

APPENDIX TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

~~11000 METHYLENE CHLORIDE~~

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

T001 - TREATMENT IN TANKS

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	—	—	—	N/A
b. Facility expansion?	—	—	—	N/A
c. Change of owner or operator?	—	—	—	N/A
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X	—	—	
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	X	—	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	—	N/A
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	X	—	—	
or				
b. i. Artificial or natural barrier around facility?	X	—	—	
and				
ii. Controlled entry?	X	—	—	
c. Danger sign(s) at entrance?	—	X	—	
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	X	—	—	

*Not Inspected

YES NO NI Remarks

- b. Does the owner or operator have an inspection schedule at the facility? X
- c. If so, does the schedule address the inspection of the following items:
- i. monitoring equipment?
 - ii. safety and emergency equipment?
 - iii. security devices?
 - iv. operating and structural equipment (i.e. dikes, pumps, etc.)?
 - v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?
 - vi. inspection frequency (based upon the possible deterioration rate of the equipment)?
- d. Are areas subject to spills inspected daily when in use? X
- e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? X
- f. Does the inspection log contain the following information:
- i. the date and time of the inspection?
 - ii. the name of the inspector?
 - iii. a notation of the observations made?
 - iv. the date and nature of any repairs or remedial actions?

5. Do personnel training records include: 265.16

- a. Job titles? X
- b. Job descriptions?

	YES	NO	NI	Remarks
c. Description of training?	___	___	___	_____
d. Records of training?	___	___	___	_____
e. Did facility personnel receive the required training by 5-19-81?	___	___	___	_____
f. Do new personnel receive required training within six months?	___	___	___	_____
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	___	___	___	_____
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	___	___	___	N/A _____
b. No smoking signs?	___	___	___	N/A _____
c. Separation and protection from ignition sources?	___	___	___	N/A _____

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES NO NI Remarks

— X —

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

— X —

NEAREST PHONE IS
IN GASOLINE PUMPHOUSE 50 FEET AWAY,
BUT THIS IS LOCKED; NEXT NEAREST

b. Telephone or 2-way radios
at the scene of operations?

X — —

IS AT THE LOADING DOCK 200 FT AWAY -
ALWAYS ACCESSIBLE

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

X — —

HYDRANT IS NEXT TO BARREL STORAGE
SPILL CONTROL EQUIPMENT

Indicate the volume of water and/or foam available for fire control:

WATER TANK (TOWER) CONTAINS 15000 GALLONS WITH
1600 GAL. PER MINUTE PUMPING CAPACITY;

CITY SUPPLY ALSO AVAILABLE.

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

X — —

b. Is emergency equipment
maintained in operable
condition?

X — —

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

— X —

5. Is there adequate aisle space
for unobstructed movement?

X — —

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

X — —

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

THERE IS NO CONTINGENCY PLAN FOR HAZARDOUS WASTE AT THE FACILITY. THERE IS AN SPCC PLAN FOR OTHER EMERGENCIES.

- a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
- b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
- c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?		<u>X</u>		ENGINEER SPEC IDENTIFIES PLANT AS AS RESPONSIBLE INDIVIDUAL AND LISTS HIS HOME PHONE AND ADDRESS
b. Is coordinator familiar with all aspects of site operation and emergency procedures?				THE PLANT MGR. IS IS LISTED ALSO WITH WORK & HOME PHONE
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?				
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				SEE ABOVE

3. Emergency Coordinator 265.55

a. Is the facility Emergency Coordinator identified?

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	—	N/A
b. Are records of past shipments retained for 3 years?	—	—	—	N/A
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	—	—	—	N/A
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	—	X	—	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	—	—	—	
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	—	—	—	
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

- iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

- v. Reports detailing all incidents that required implementation of the Contingency Plan?

- vi. All closure and post closure costs as applicable?

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

____ X ____

5. **Unmanifested Waste Reports 265.76

- a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or shipping paper?

____ N/A ____

- b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

____ N/A ____

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks

1. Closure 265.112

a. Is the facility closure plan available for inspection?

— X —

b. Does the plan identify:

i. maximum extent unclosed during facility life?

— — —

ii. maximum hazardous waste inventory?

— — —

iv. estimated year of closure?

— — —

v. schedule of closure activities?

— — —

c. Has closure begun?

— X —

*2. Post-Closure 265.118

a. Is the post-closure plan available for inspection?

— — —

N/A

b. Does this plan contain:

i. description of groundwater monitoring activities and frequencies?

— — —

ii. description of maintenance activities and frequencies for

AA. integrity of cap, final cover, or containment structures, where applicable

— — —

BB. facility monitoring equipment

— — —

iii. name, address, and phone number of person or office to contact during post-closure care period?

— — —

c. Has the post-closure period begun?

— — —

d. Is the written post-closure cost estimate available? 265.144

— — —

*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	___	___	_____
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	___	___	_____
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	___	___	_____
4. Are containers stored closed?	<input checked="" type="checkbox"/>	___	___	_____
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	___	___	_____
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	___	___	___	<u>N/A</u>
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	___	___	___	<u>N/A</u>
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	___	___	___	<u>N/A</u>

Appendix GN

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<u>X</u>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>3</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<u>X</u>			
b. Name, mailing address, telephone number, and EPA ID number of Generator	<u>X</u>			
c. Name and EPA ID Number of Transporter(s)?	<u>X</u>			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u>X</u>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>			
g. Required certification?	<u>X</u>			
h. Required signatures?	<u>X</u>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>N/A</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>N/A</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	STATED THAT MATERIAL IS REMOVED BY TANK TRUCK WITH HOSE TO Siphon OUT OF BARRELS
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?	_____	_____	_____	<u>N/A</u>
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	_____	_____	_____	<u>N/A</u>
iii. Met the Manifest requirements?	_____	_____	_____	<u>N/A</u>
b. Importing Hazardous Waste; has the generator met the manifest requirements?	_____	_____	_____	<u>N/A</u>

STATE OF MICHIGAN



WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

Water Quality Division
9311 Groh Road
Grosse Ile, Michigan 48138

NATURAL RESOURCES COMMISSION

ACOB A. HOEFER
EARL T. JOHNSON
E.M. LAITALA
HILARY F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

EPA

#1067

October 8, 1982

CERTIFIED MAIL

Mr. James Fox, Senior Engineer
GMC Chevrolet Detroit Assembly
601 Piquette
Detroit, Michigan 48202

OCT 13 1982
DET 61

Re: MID076380583

Dear Mr. Fox:

On September 23, 1982, Susan Norton of this office inspected the Chevrolet Detroit Assembly plant. The purpose of the visit was to determine compliance with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. The facility was reviewed as a storage facility based on its Part A permit application. As a result of the inspection, she determined that the facility is in violation of certain requirements, which are listed below. Sections of the law cited refer to the Code of Federal Regulations, (Title 40 CFR), revised on July 1, 1981.

1. There was not a detailed waste analysis plan available for inspection, as required by 40 CFR 265.13(b).
2. There were no "Danger" signs at the entrance to the hazardous waste storage facility. This is in violation of 40 CFR 265.14(c).
3. A schedule of inspection of the hazardous waste facility was not available for review. This is contrary to the provisions of 40 CFR 265.15(b). The inspection schedule must include: monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment (such as containment devices). It should also indicate the inspection frequency for each item and the types of problems the inspector should check for during the inspection.
4. As a result of Item 3 above, there was no inspection log. This is in violation of 40 CFR 265.15(d). The log must include the date and time of the inspection, the name of the inspector, a notation of observations, and the date and type of any repairs or corrections.



Mr. James Fox
October 8, 1982
Page 2

5. There were no records that personnel handling hazardous waste at the plant had completed a program of training, or that an annual review of such training had taken place. This is contrary to the requirements of 40 CFR 265.16.
6. There was not an internal communications or alarm system available at the hazardous waste storage facility. This is in violation of 40 CFR 265.32(a). By extension, the facility is also in violation of 40 CFR 265.34, which requires immediate access to such equipment.
7. Although there was a Spill Prevention, Control and Countermeasure Plan at the facility, no elements of it addressed hazardous waste emergencies, nor was there a hazardous waste Contingency Plan. Such a Plan, or an appropriately amended SPCC, is required by 40 CFR 265, Subpart D.
8. There was no operating record available for review by the inspector, as required by 40 CFR 265.73.
9. A closure plan had not been devised for the facility, in violation of 40 CFR 265.112.
10. As a result of Items 1, 4, 5, 7, 8 and 9, adequate records and plans were not available for review during the inspection, as required by 40 CFR 265.74(a).

In addition to the deficiencies listed above, certain other points arose during the inspection which merit attention:

The original Part A permit application listed F007, F008 and F009 as the wastes generated at the plant. These refer to sludges generated by the "Bonderite" process. The company tests indicate that no metals in the sludge exceed EP toxicity limits, and there is no cyanide present. If the sludge manifests no other hazardous characteristics, we urge you to request U.S.E.P.A. to remove these listings from your file.

The only hazardous waste observed at the plant was waste methylene chloride, U080, which should be filed with U.S.E.P.A. immediately if you have not already done so. You may write them at the following address:

2001
F002

Regional Administrator
EPA Region V
RCRA Activities
P.O. Box A 3587
Chicago, Ill. 60690

Mr. James Fox
October 8, 1982
Page 3

Should you make any changes in your waste listings or other RCRA activities, we would appreciate notification by copy of your correspondence.

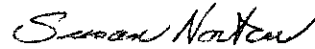
A copy of the RCRA inspection report is enclosed for your examination. We request that you respond to this office by letter no later than November 15, 1982, providing documentation of the actions you have taken to correct the violations listed above. Should you have any questions, please do not hesitate to call this office at (313) 675-0860. We appreciate your time and cooperation during the inspection.

Yours truly,

WATER QUALITY DIVISION



Roy E. Schrameck, P.E.
District Engineer



By: Susan Norton
Water Quality Specialist

RES:SN/sc

Enclosure

cc: Alan Howard, OHWM (2)
F. B. Quakenbush

CHEVROLET



Central Office

March 20, 1981

Administrator, Region V
Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Dear Sir:

Please find attached a copy of two delegation of authority letters sent to Chevrolet Plant Managers and signed by Mr. R. D. Lund, General Manager, Chevrolet Motor Division and Vice President, General Motors Corporation, as required by the Consolidated Permit Regulations, Part 122 and the General Pretreatment Program Regulations 40 CFR 403.

Also attached is a listing of all Chevrolet plants covered by this authorization in Region V.

Sincerely,

A handwritten signature in cursive script, appearing to read 'G. E. Calhoun'.

G. E. CALHOUN
Staff Engineer-Environmental
Manufacturing Facilities,
Research & Development

GEC/nrm
Attachments

cc: Director, Michigan EPA
Director, Ohio EPA
Director, Indiana SPC Board

REGION V

Michigan Plants

Chevrolet-Adrian - P.O. Box 688, Adrian, MI 49221
Chevrolet-Bay City - 100 Fitzgerald St., Bay City, MI 48706
Chevrolet-Detroit Assembly - 601 Piquette Ave., Detroit, MI 48202 ✓ H1D676386383
Chevrolet-Detroit Forge - 8435 St. Aubin, Detroit, MI 48212
Chevrolet-Detroit Gear & Axle - 1840 Holbrook, Detroit, MI 48212
Chevrolet-Flint Assembly - Van Slyke Road at Atherton Rd., Flint, MI 48551
Chevrolet-Flint Engine - G-3248 Van Slyke Road, Flint, MI 48552
Chevrolet-Flint Metal Fabricating - G-2238 West Bristol Rd., Flint, MI 48553
Chevrolet-Flint Motor - 300 N. Chevrolet Ave., Flint, MI 48555
Chevrolet-Flint Pressed Metal - 300 N. Chevrolet Avenue, Flint, MI 48555
Chevrolet-Livonia - 13000 Eckles Rd., Livonia, MI 48151
Chevrolet-Saginaw GIC - 1629 N. Washington Ave., Saginaw, MI 48601
Chevrolet-Saginaw Manufacturing - 2328 E. Genesee Ave., Saginaw, MI 48605
Chevrolet-Saginaw NIC - 2100 Veterans Memorial Parkway, Saginaw, MI 48601
Chevrolet-Saginaw Parts - 1305 N. Washington Avenue, Saginaw, MI 48601

Indiana Plants

Chevrolet-Indianapolis - P.O. Box 388, Indianapolis, Indiana 46206
Chevrolet-Muncie - P.O. Box 2527, Muncie, Indiana 47302

Ohio Plants

Chevrolet-Moraine Assembly - P.O. Box 1291, Dayton, Ohio 45401
Chevrolet-Moraine Engine - P.O. Box 1291, Dayton, Ohio 45401
Chevrolet-Parma Manufacturing - P.O. Box 6436, Cleveland, Ohio 44101
Chevrolet-Parma Pressed Metal - P.O. Box 6436, Cleveland, Ohio 44101
Chevrolet-Toledo Transmission - P.O. Box 909, Toledo, Ohio 43692

CHEVROLET



Central Office

March 17, 1981

ALL CHEVROLET PLANT MANAGERS:

SUBJECT: Delegation of Authority to Sign
Reports Under Environmental Programs

The position of plant manager is hereby designated as my duly authorized representative for purposes of signing industrial user reports and future compliance monitoring reports under EPA's General Pretreatment Programs Regulations, 40 C.F.R. 403, 46 Federal Register 9439 et seq. (January 28, 1981).

In the absence of the person occupying the designated position due to vacation, illness, or other reasons, the person temporarily responsible for the operation of the facility or activity is my duly authorized representative.

A handwritten signature in cursive script, appearing to read "Robert D. Lund".

Robert D. Lund

CHEVROLET



Central Office

March 17, 1981

ALL CHEVROLET PLANT MANAGERS:

SUBJECT: Delegation of Authority to
Sign Reports Under EPA
Consolidated Permit Program

As required under Environmental Protection Agency Consolidated Permit Regulations, Part 122, Section 122.6, the position of plant manager is hereby designated as my duly authorized representative for Chevrolet- (See attached listings).

As such, the plant manager is authorized to sign all reports required permits, other information requested by the Director, and all permit applications submitted for Class II wells under Section 122.38 for the Underground Injection Control Program.

In the absence of the person occupying the designated position due to vacation, illness, or other reasons, the person temporarily responsible for the operation of the facility or activity is my duly authorized representative.

A handwritten signature in cursive script, appearing to read 'Robert D. Lund', is written above the printed name.

Robert D. Lund

: EPA Regional Administrator/State Director

**D. Corrective
Action**

Determination: Soil sampling**PA/VSİ Or RFA FILE REVIEW CHECKLIST**

Facility Name: GMC (Chevrolet Detroit Assembly)

EPA ID: MID 076 380 583 _____ City: Detroit _____ State: MI _____

Name of Reviewer: Maureen McHugh _____ Date of Review: 8/8/08 _____

1	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Is this a one folder site?
2	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Are there Superfund files for this site?
3	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you Read the Executive Summary?
			There are: <u> 12 </u> SWMUs and <u> 1 </u> AOCs at this site.
4	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you review the regulatory history?
5	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Does the facility have interim status or a permit?
			This facility is a: <u> X </u> SQG (formerly, now Inactive), <u> </u> LQG, or <u> </u> Less than 90 day.
6	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Was the Facility closed per RCRA? RCRAInfo 380 (1989)
			If Yes, was the closure: <u> X </u> CC, or <u> </u> CIP.
7	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Are there documented (historical) releases? Briefly describe on Page 2.
8	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.

As a result of your review of the PA/VSİ or RFA file, please classify this site as:

_____ No further corrective action recommended or warranted: These are sites that closed the regulated units and any other SWMUs or AOCs at the site did not warrant any further corrective action (no historic releases or evidence of releases observed during the Visual Site Inspection).

 X Further Action Required: Soil or sediment sampling or groundwater sampling or monitoring or any type of investigation that was recommended in the report in response to a documented or observed release at any SWMU or AOC and where such investigation, whether being addressed during the inspection or after, does not have the necessary documentation in the facility record files.

_____ More Information Needed: There is no RFA, PA/VSİ or RCRA closure information available.

PA/VSI Or RFA FILE REVIEW CHECKLIST

Notes

Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

In 1983, about 50gal of fuel oil was released to the Detroit city sewer system.

In 1986, 250gal of unleaded gasoline was released to the Detroit sewer system

The facility exceeded its air permit limits for burning fuel oil twice.

Briefly describe any releases observed during the inspection for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

The surface of the water in the lime wastewater holding tank (SWMU7) and the storm water manhole near the unit contained water with a milky sheen.

Oil stains on the concrete floor surrounding SWMU11

Puddles of used oil on the steel roof surrounding the AST at SWMU12

Fuel stains on one side of the AST at AOC1 and the vegetation around it appeared to be stressed. The ASTs are located on the soil.

PA/VSI Recommendations

Soil sampling at AOC1

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Mary Wojciechowski

Date: March 7, 1994

RECEIVED
MID RECORD CENTER

JAN 31 1995

Background Facility Information

Facility Name: General Motors Corporation (GMC) North American Truck Platforms
(formerly GMC Truck & Bus Group)
EPA Identification No.: MID 076 380 583
Location (City, State): Detroit, Michigan
Facility Priority Rank: Low

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire facility which consists of 12 SWMUs and 1 AOC.

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

- ☐ No corrective action activities initiated (Go to 5)
☒ RCRA Facility Assessment (RFA) or equivalent completed
☐ RCRA Facility Investigation (RFI) underway
☐ RFI completed
☐ Corrective Measures Study (CMS) completed
☐ Corrective Measures Implementation (CMI) begun or completed
☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- ☐ Operating permit
☐ Post-closure permit
☐ Enforcement order
☒ Other (Explain)

Corrective actions have not been initiated.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

- ☐ Yes
☐ No
☐ Uncertain; still underway
☒ Not required

Additional explanatory notes:

Interim measures have not been required.

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

- ☐ Groundwater
- ☐ Surface water
- ☐ Air
- ☒ Soils

6. Are contaminant releases migrating off-site?

- ☐ Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:

Surface water:

Air:

Soils:

- ☐ No
- ☒ Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 8a)
- ☐ No
- ☒ Uncertain

Additional explanatory notes:

Soil contamination is suspected but has not been confirmed.

7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
- ☐ No
- ☒ Uncertain

Additional explanatory notes:

Soil contamination is suspected but has not been confirmed.

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 9)
- ☐ No
- ☒ Uncertain

Additional explanatory notes:

Soil contamination is suspected but has not been confirmed.

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
- ☐ No
- ☒ Uncertain

Additional explanatory notes:

Soil contamination is suspected but has not been confirmed.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

Final corrective measures have not been identified or planned.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

Soil contamination is suspected but has not been confirmed. However, the source of these suspected releases could be eliminated through proper secondary containment.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

Soil contamination is suspected but has not yet been confirmed.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

☐ Solid
☐ Light non-aqueous phase liquids (LNAPLs)
☐ Dense non-aqueous phase liquids (DNAPLs)
☐ Dissolved in groundwater or surface water
☐ Gaseous
☒ Other Aqueous liquids and oils

13. Which of the following major chemical groupings are of concern at the facility?

☒ Volatile organic compounds (VOCs) and/or semi-volatiles
☐ Polynuclear aromatics (PAHs)
☐ Pesticides
☐ Polychlorinated biphenyls (PCBs) and/or dioxins
☐ Other organics
☒ Inorganics and metals
☐ Explosives
☐ Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

(X) Yes; Indicate possible course of action.

Soil contamination is suspected but has not been confirmed. However, the source of these suspected releases could be eliminated through proper secondary containment.

() No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

(X) Yes
() No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

() Yes
() No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

(X) Yes
() No
() Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

(X) Yes
() No
() Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

- ☒ Yes
- ☐ No, not feasible
- ☐ No, not required
- ☒ Further investigation necessary

Explain final decision, using additional sheets if necessary.

The following information was obtained from a 1993 PA/VSI prepared by PRC.

Releases to on-site soil are suspected but have not been confirmed. The source of these suspected releases include:

- An underground wastewater holding tank of unknown integrity
- An open top waste oil AST
- Two diesel fuel ASTs located on a soil base

Further investigation is required to confirm whether releases have occurred. However, the threat of a release could be reduced if the following were done:

1. Cover the waste oil AST
2. Provide a concrete base beneath the diesel fuel ASTs
3. If necessary, repair the UST and associated piping.

Additional stabilization may be required if releases to soil are confirmed.



General Motors Truck Group

D.I.4

February 10, 1997

Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch
USEPA
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Visual Site Inspection
General Motors Truck Group
Detroit Assembly Plant
Detroit, Michigan 48202
MID 076 380 583

Dear Mr.

On June 3, 1993, PRC Environmental Management, Inc. representatives conducted a Visual Site Inspection (VSI) at the GM Truck Group - Detroit Assembly Plant. The inspection was thorough and professional. We appreciate EPA's cooperation in making the resulting Preliminary Assessment/Visual Site Inspection Final report, dated Nov. 19, 1993, available to us for review.

Attached are our GMTG Comments on Visual Site Inspections on the Final Report. They consist of several general GMTG Comments on Visual Site Inspection and a series of factual corrections, including some information that was not available at the time of the inspection. If you have any questions, please call Tommy E. Henderson, the facility Environmental Engineer at (313) 974-3702.

Sincerely yours,

Richard C. Weiermiller,
Platform Manager

RECEIVED
FEB 18 1997

DIVISION FRONT OFFICE
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5



HRE-8J

GMTG Comments on Visual Site Inspection

General GMTG Comments on Visual Site Inspections

First. GM Truck Group is unaware of any statutory or regulatory criteria for designating an area an "Area of Concern" (AOC). This term should not be used by the agency in designating an area as subject to corrective action until it has properly promulgated a definition of it. Even under the Agency's unpromulgated definition, an "Area of Concern" must, at least, be associated with a release or suspected release. The RCRA Facility Assessment Guidance (EPA Office of Solid Waste, Washington, DC, October 1986, PB87-107769) provides five (5) categories of information an investigator needs to consider in determining the likelihood of a release and its significance. They are: Unit Characteristics, Waste Characteristics, Migration Pathways, Evidence of Release and Exposure Potential. No information exists in any of these categories to support designation of the entire facility as causing a release or suspected release.

Secondly. All discharge from the Plant - both process and storm goes to the City POTW. The Milky White shine noted by PRC (page 14, line 01) was discharged to the City POTW and per the attached Shrader Laboratories Report C060 dated 6-24-1993 the waste meets the City of Detroit Permit Discharge Limits. Reference by PRC (page 14 line 14) to two (2) releases to surface water is not true. The releases were into the City of Detroit POTW Sewer System and in both cases the City of Detroit was notified and the City Fire Department assisted GM personnel with controlling the release.

Following are other items of factual correction listed by page and line item.

Pg. 4

line 05: The GMC-NATP facility is located at 601 Piquette Road **(Avenue)**.

line 07: The facility occupies ~~43~~ **18** acres ...

line 08: The facility is bordered on the north by ~~Grand Trunk~~ **Consolidated Rail Corporation (New York Central)**

line 17: name to General Motors Corporation Assembly Division **(GMAD)**



HRE-8J

GMTG Comments on Visual Site Inspection Continued

pg. 6

line 10: The facility consists of one assembly building with ~~three~~ **six** floors ...

line 23: streams **(if any)** generated by the GMC-FB facility are unknown.

pg. 10

pg. 11

line 22: the facility used paints containing lead ~~(D008)~~ and zinc ~~(003D)~~ **reference to waste codes is inappropriate for process material.**

pg. 12

line 12,13: ...; ~~however,~~ the disposition of these wastes is ~~unknown~~. were **transported to City Disposal Systems.**

line 21: facility currently generates about ~~1,375~~ **275** gallons of spent toluene **(in 1993)**...

pg. 13

line 09: The painting operation consisted of **recirculating water to catch paint** over spray in ~~a~~ water curtain ...

line 14: facility also had no documentation **(see attached Shrader Laboratories Report #C504 dated 12-2-1993).**

pg. 14

line 04: Facility representatives did ~~not~~ know the size of the Lime waste water holding tank (SWMU 7); **the tank is 500 gallons including a three compartment weir used to separate the lime solids prior to discharge of the waste water into the City of Detroit Sewer System.**



HRE-8J

GMTG Comments on Visual Site Inspection Continued

pg 14

line 10: Industries in East Chicago, Indiana, **USPCI Echo Mountain; Sawyer, North Dakota** for disposal.

line 11: In 1993, the facility had a one-time generation of ~~caustic~~ **Rinsate** waste water.

line 13: ... the ~~caustic~~ **Rinsate** WASTEWATER was stored in 15 55-gallon steel

line 14: ~~Caustic~~ **Rinsate** waste water is being ~~was~~ analyzed (**See attached Shrader Laboratories Report # C059 dated June 29, 1993**).

line 20: The facility generates about ~~96,000~~ **17,600** gallons of this waste ~~annually~~ in 1993.

line 21: waste is transported off site to ~~Petro-Chem~~ **General Oils Co. Inc.** in Detroit, Michigan for ~~fuel blending~~ **reclaiming**.

pg 16

line 03: Also, paint sludges (F017) were ~~delisted~~ **withdrawn (not designated HW)** on January 16, 1981 (GMC-CP 1982).

pg. 17

line 22: GMC-NATP facility ~~had~~ has two **8,000 gallon unleaded gasoline USTs**. and **One 8,000 gallon unleaded gasoline UST** and one **8000 gallon automatic Transmission fluid 10,000 UST both installed in 1985**.

line 24: In 1990 and 1991 the facility ~~removed~~ **upgraded** the three USTs **with double walled piping and leak detection equipment**.

line 26: In ~~1991~~ **1973** the facility installed one 10,000-gallon UST for unleaded



HRE-8J

GMTG Comments on Visual Site Inspection Continued

pg. 19

line 22: It generally flows southwest east toward the Detroit River.

pg. 28

line 01: This unit has no release controls. **Three section weir for lime solids sedimentation.**

line 14: This unit managed non hazardous phosphating sludge from 1985 until 1987. **The shed was used for hazardous waste and hazardous material storage. The non hazardous phosphating sludge was stored in SWMU 3.**

pg. 29

line 13: off site to U. S. Pollution Control Industries, ~~in East Chicago, Indiana,~~ **at their Echo Mountain facility in Sawyer, North Dakota** for disposal.

pg. 30

line 07: This unit manages caustic **rinsate** waste water.

line 15: the unit contained 15 55-gallon steel drums of caustic **rinsate**

pg. 31

line 7: transported off site to ~~Petro-Chem~~ **General Oils, Co. Inc.** in Detroit, Michigan, for ~~fuel blending~~ **reclaiming.**

line 20: ~~This unit is active.~~ **The 800-gallon steel AST was cleaned and dismantled on July 10, 1994. The area was cleaned, the rinsate disposed of, and the roofing replaced. Used Oils collected from each of the eleven (11) SWMU sites are now placed in a holding area for direct removal of contents by Inland Waters.**

HRE-8J



General Motors Truck Group

GMTG Comments on Visual Site Inspection Continued

pg. 33

line 04: ~~Product Diesel Fuel ASTs~~ **#6 Fuel Oil ASTs**

line 05: This area consists of two ~~60000~~ **150,000** gallon ASTs ...

line 06: ~~product diesel fuel~~ **power house steam boiler fuel used to heat the building**

line 09: ~~It is not known if one of the ASTs leaked.~~ **Subsequent to PRC's visit, it was determined that the stains were caused by #6 Fuel Oil escaping from the tank vent.**



SHRADER

Analytical and Consulting

LABORATORIES INC.

REPORT OF ANALYTICAL SERVICES -

SUBMITTED TO:

GM TRUCK & BUS GROUP, DETROIT ASSEMBLY
601 PIQUETTE AVENUE
DETROIT, MICHIGAN 48202

ATTN: MR. THOMAS HENDERSON

We are pleased to provide the enclosed analytical results for the following sample(s). Should you have any questions regarding the methods and/or results, please feel free to write or call.

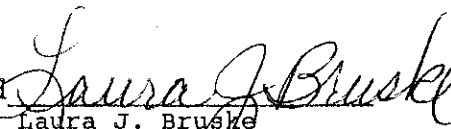
Customer sample : 11/17/93
Sample description : PAINT PROCESS BOOTH PIT
Project # : C504
Analysis performed : GC/MS, AA AND
WASTEWATER PARAMETERS

Date received : November 17, 1993
Date completed : December 1, 1993
Report date : December 2, 1993

Approved


George P. Baker, QA/QC

Verified


Laura J. Brucke

Enclosure(s)

- Continued -

Project #C504

GM TRUCK & BUS GROUP, DETROIT ASSEMBLY
Sample(s) #11/17/93 - PAINT PROCESS BOOTH PIT

December 2, 1993

Page 2

S A M P L I N G D E T A I L :

On Wednesday, November 17, 1993, several grab samples were collected from the PAINT PROCESS BOOTH PIT at the TRUCK & BUS DETROIT ASSEMBLY ON PIQUETTE as required for organic, inorganic and wastewater analyses.

A N A L Y T I C A L P R O C E D U R E :

The sample (SL #C50401) was analyzed for total toxic organics (TTO) according to EPA Methods 624 and 625. Metals were analyzed by atomic absorption spectroscopy according to EPA methods. Other parameters were by Standard Methods.

R E S U L T S :

Complete quantitation summaries and the chromatograms generated during TTO analyses are enclosed. All other results are on the following pages.

It should be noted that the sample extract contained extremely high concentrations of non-priority pollutants, primarily hydrocarbons (oil). A large amount of ethylhexanoic acid was also detected.

-Continued-

Project #C504

GM TRUCK & BUS GROUP, DETROIT ASSEMBLY
Sample(s) #11/17/93 - PAINT PROCESS BOOTH PIT

December 2, 1993

Page 3

R E S U L T S : (cont'd)

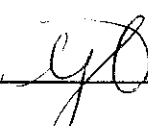
Units are listed in milligrams/liter (mg/L) with the exception of pH.

<u>PARAMETER</u>	<u>RESULTS</u>	<u>D.L.¹</u>
pH	7.5	--
Biochemical oxygen demand	456	4
Fats, oil and grease	810	1
Suspended solids	2900	1
Cyanide	N.D. ²	0.02
Phenols	0.093	0.005
Phosphorus	N.D.	0.2
Arsenic	0.008	0.004
Cadmium	0.005	0.002
Chromium	N.D.	0.05
Copper	0.03	0.005
Iron	4.7	0.05
Lead	N.D.	0.05
Mercury	N.D.	0.0004
Nickel	N.D.	0.05
Silver	N.D.	0.005
Zinc	0.82	0.005

¹D.L. = Detection Limit

²N.D. = Not Detected

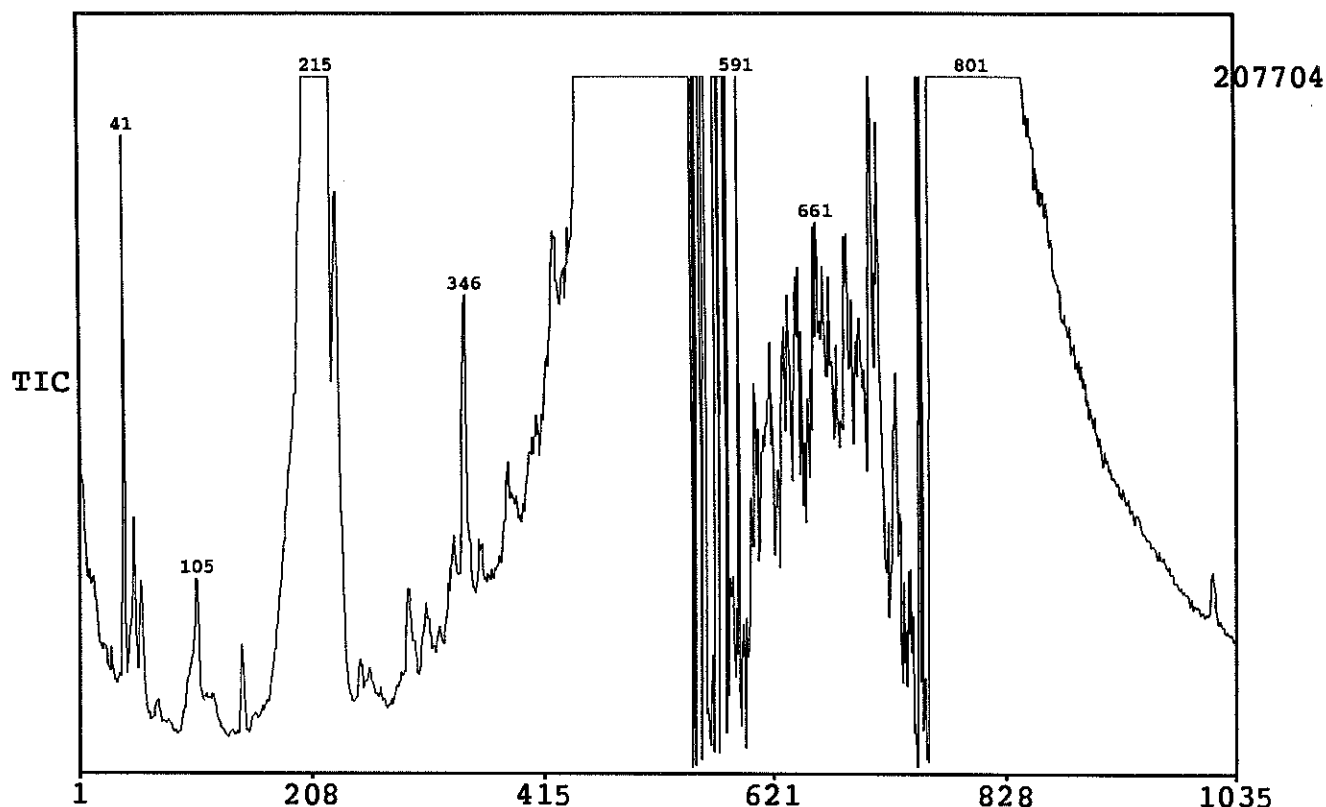
LJB/rac



A handwritten signature, possibly 'LJB', is written over a horizontal line.

SHRADER LABORATORIES, INC.
11-22-1993

C50401A 11/17/93 PAINT PROCESS BOOTH PIT
Date run : 11-19-1993(15:49:01) Instr. : Q1* Operator : LAPM



SHRADER LABORATORIES, INC.

Report date : 11-22-1993

SPIKE RECOVERY REPORT

DATA file : C50401A

Sample size : 100 ml

Description : 11/17/93 PAINT PROCESS BOOTH PIT

Sample submitted by : GMC TRUCK & BUS

Analyzed on 11-19-1993 by LAPM

Report prepared by BRUL

COMPOUND	CONCENTRATION Micrograms/Liter	SPIKE	Percent Recovery
2-FLUOROBIPHENYL	560	1,200	46.7% 3
NITROBENZENE-D5	890	1,200	74.2% 1
TERPHENYL-D14	530	1,200	44.2% 2
2-FLUOROPHENOL	1,600	2,400	66.7% 1
PHENOL-D6	1,100	2,400	45.8% 2
TRIBROMOPHENOL	1,700	2,400	70.8% 1

SHRADER LABORATORIES, INC.

Report date : 11-22-1993

QUANTITATION SUMMARY

DATA file : C50401A

Sample size : 100 ml

Description : 11/17/93 PAINT PROCESS BOOTH PIT

Sample submitted by : GMC TRUCK & BUS

Analyzed on 11-19-1993 by LAPM

Report prepared by BRUL

COMPOUND	CONCENTRATION Micrograms/Liter	Det.Limit
2-CHLOROPHENOL	N.D.	6
2,4-DICHLOROPHENOL	N.D.	20
2,4-DIMETHYLPHENOL	27	10
4,6-DINITRO-O-CRESOL	N.D.	50
2,4-DINITROPHENOL	N.D.	50
2-NITROPHENOL	N.D.	20
4-NITROPHENOL	N.D.	30
P-CHLORO-M-CRESOL	N.D.	20
PENTACHLOROPHENOL	N.D.	70
PHENOL	N.D.	5
2,4,6-TRICHLOROPHENOL	N.D.	30

N.D. = Not detected TOTAL

27.0

SHRADER LABORATORIES, INC.

Report date : 11-22-1993

QUANTITATION SUMMARY

DATA file : C50401A

Sample size : 100 ml

Description : 11/17/93 PAINT PROCESS BOOTH PIT

Sample submitted by : GMC TRUCK & BUS

Analyzed on 11-19-1993 by LAPM

Report prepared by BRUL

COMPOUND	CONCENTRATION Micrograms/Liter	Det.Limit
ACENAPHTHENE	N.D.	8
ACENAPHTHYLENE	N.D.	5
ANTHRACENE	N.D.	5
BENZIDINE	N.D.	6
BENZO(a)ANTHRACENE	N.D.	4
BENZO(a)PYRENE	N.D.	8
3,4-BENZOFUORANTHENE	N.D.	9
BENZO(ghi)PERYLENE	N.D.	8
BENZO(k)FLUORANTHENE	N.D.	9
bis(2-CHLOROETHOXY)METHANE	N.D.	9
bis(2-CHLOROETHYL)ETHER	N.D.	5
bis(2-CHLOROISOPROPYL)ETHER	N.D.	20
bis(2-ETHYLHEXYL)PHTHALATE	N.D.	30
4-BROMOPHENYL PHENYL ETHER	N.D.	40
BUTYL BENZYL PHTHALATE	N.D.	20
2-CHLORONAPHTHALENE	N.D.	9
4-CHLOROPHENYL PHENYL ETHER	N.D.	20
CHRYSENE	N.D.	5
DIBENZO(a,h)ANTHRACENE	N.D.	10
1,2-DICHLOROBENZENE	N.D.	7
1,3-DICHLOROBENZENE	N.D.	7
1,4-DICHLOROBENZENE	N.D.	6
3,3'-DICHLOROBENZIDINE	N.D.	30
DIETHYL PHTHALATE	N.D.	40
DIMETHYL PHTHALATE	N.D.	7
DI-n-BUTYL PHTHALATE	N.D.	200
2,4-DINITROTOLUENE	N.D.	20
2,6-DINITROTOLUENE	N.D.	30
DI-n-OCTYL PHTHALATE	N.D.	20
1,2-DIPHENYLHYDRAZINE	N.D.	8
FLUORANTHENE	N.D.	6
FLUORENE	N.D.	7
HEXACHLOROBENZENE	N.D.	40
HEXACHLOROBUTADIENE	N.D.	50
HEXACHLOROCYCLOPENTADIENE	N.D.	50
HEXACHLOROETHANE	N.D.	30
INDENO(123-cd)PYRENE	N.D.	8
ISOPHORONE	N.D.	6
NAPHTHALENE	N.D.	4
NITROBENZENE	N.D.	10
N-NITROSO-DIMETHYLAMINE	N.D.	10
N-NITROSO-DI-n-PROPYLAMINE	N.D.	30
N-NITROSO-DIPHENYLAMINE	N.D.	10
PHENANTHRENE	N.D.	6
PYRENE	N.D.	4
1,2,4-TRICHL'BENZENE	N.D.	20

N.D. = Not detected TOTAL

0

SHRADER LABORATORIES, INC.

Report date : 11-22-1993

QUANTITATION SUMMARY

DATA file : C50401A

Sample size : 100 ml

Description : 11/17/93 PAINT PROCESS BOOTH PIT

Sample submitted by : GMC TRUCK & BUS

Analyzed on 11-19-1993 by LAPM

Report prepared by BRUL

COMPOUND	CONCENTRATION Micrograms/Liter	Det.Limit
ALDRIN	N.D.	100
A-BHC	N.D.	40
B-BHC	N.D.	60
G-BHC (LINDANE)	N.D.	40
D-BHC	N.D.	70
CHLORDANE	N.D.	200
4,4'-DDD	N.D.	10
4,4'-DDE	N.D.	20
4,4'-DDT	N.D.	10
DIELDRIN	N.D.	200
ENDOSULFAN I	N.D.	200
ENDOSULFAN II	N.D.	100
ENDOSULFAN SULFATE	N.D.	90
ENDRIN	N.D.	100
HEPTACHLOR	N.D.	100
HEPTACHLOR EPOXIDE	N.D.	200
TOXAPHENE	N.D.	200
ENDRIN ALDEHYDE	N.D.	300
TETRACHLORODIBENZO-P-DIOXIN	N.D.	50

N.D. = Not detected TOTAL

0

SHRADER LABORATORIES, INC.

Report date : 11-19-1993

QUANTITATION SUMMARY

Data file : C50401A.QMM

Amount extracted : 100 ml

Description : 11/17/93 PAINT PROCESS BOOTH PIT

Sample submitted by : GMC TRUCK & BUS GROUP

Analyzed on 11-18-1993 by ROBG

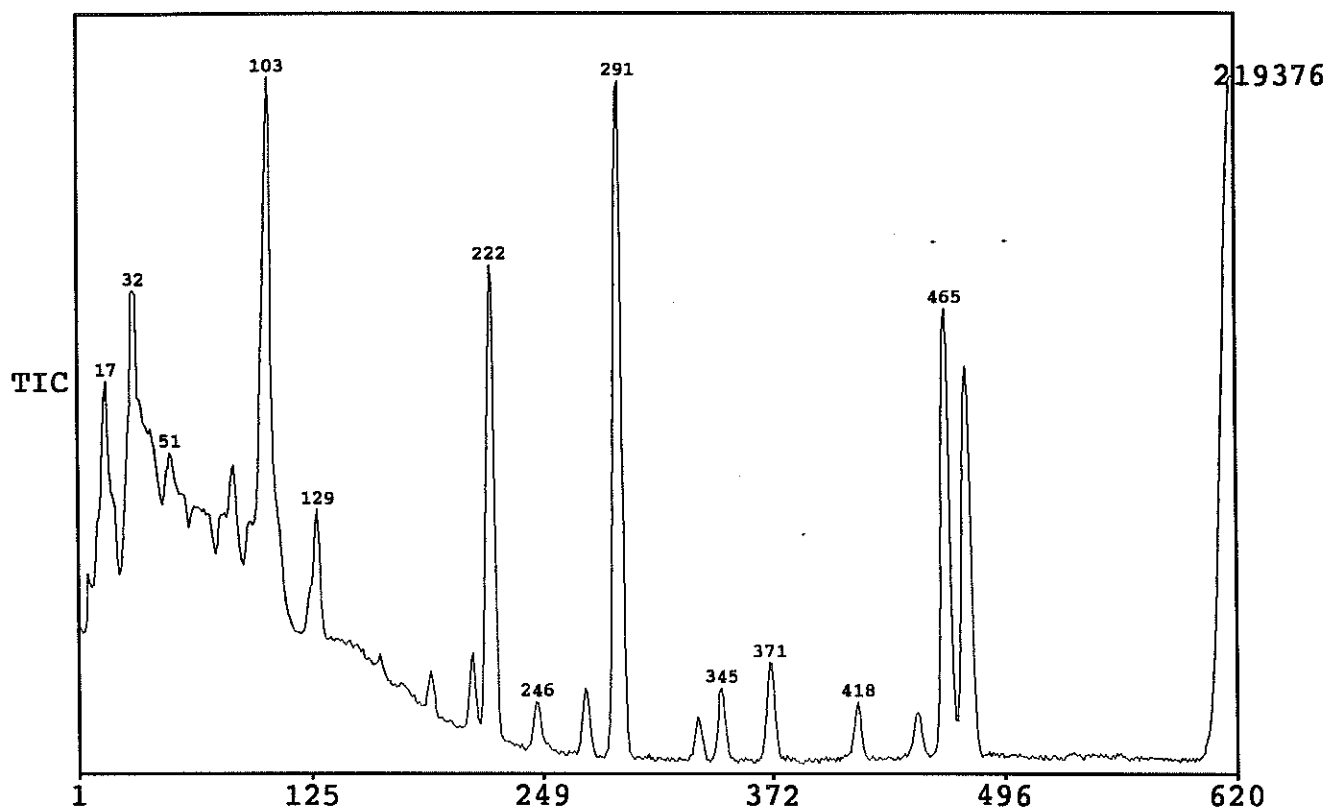
Report prepared by LAPM

COMPOUND	CONCENTRATION Micrograms/Liter	Det.Limit
Arochlor-1016 A	N.D.	200
Arochlor-1016 B	N.D.	30
Arochlor-1016 C	N.D.	30
Arochlor-1221 A	N.D.	7
Arochlor-1221 B	N.D.	8
Arochlor-1221 C	N.D.	100
Arochlor-1232 A	N.D.	20
Arochlor-1232 B	N.D.	20
Arochlor-1232 C	N.D.	70
Arochlor-1242 A	N.D.	300
Arochlor-1242 B	N.D.	40
Arochlor-1242 C	N.D.	200
Arochlor-1248 A	N.D.	70
Arochlor-1248 B	N.D.	200
Arochlor-1248 C	N.D.	70
Arochlor-1254 A	N.D.	50
Arochlor-1254 B	N.D.	40
Arochlor-1254 C	N.D.	70
Arochlor-1260 A	N.D.	100
Arochlor-1260 B	N.D.	50
Arochlor-1260 C	N.D.	30

N.D. = Not detected

SHRADER LABORATORIES, INC.
11-18-1993

C50401B 11/17/93 PAINT PROCESS BOOTH PIT
Date run : 11-18-1993(10:52:46) Instr. : M4* Operator : ROBM



SHRADER LABORATORIES, INC.

Report date : 11-18-1993

SPIKE RECOVERY REPORT

DATA file : C50401B

Sample size : 44 ml

Description : 11/17/93 PAINT PROCESS BOOTH PIT

Sample submitted by : GMC TRUCK & BUS GROUP

Analyzed on 11-18-1993 by ROBM Report prepared by ROBM

COMPOUND	CONCENTRATION Micrograms/Liter	SPIKE	Percent Recovery
1,2-DICHL'ETHANE-D4	88	90.9	96.8% 2
BENZENE-D6	99	90.9	108.9% 1
1,4-DICHLOROBUTANE	94	90.9	103.4% 1
TOLUENE-D8	93	90.9	102.3% 1

SHRADER LABORATORIES, INC.

Report date : 11-18-1993

QUANTITATION SUMMARY

DATA file : C50401B

Sample size : 44 ml

Description : 11/17/93 PAINT PROCESS BOOTH PIT

Sample submitted by : GMC TRUCK & BUS GROUP

Analyzed on 11-18-1993 by ROBM

Report prepared by ROBM

COMPOUND	CONCENTRATION Micrograms/Liter	Det.Limit
ACROLEIN	N.D.	20
ACRYLONITRILE	N.D.	6
BENZENE	N.D.	0.8
BROMODICHLOROMETHANE	N.D.	3
BROMOFORM	N.D.	7
BROMOMETHANE	N.D.	3
CARBON TETRACHLORIDE	N.D.	4
CHLOROBENZENE	N.D.	1
CHLOROETHANE	N.D.	4
2-CHL'ETHYL V'L ETHER	N.D.	4
CHLOROFORM	N.D.	2
CHLOROMETHANE	N.D.	2
DIBROMOCHLOROMETHANE	N.D.	4
DICHLOROBENZENES	N.D.	2
1,1-DICHLOROETHANE	N.D.	4
1,2-DICHLOROETHANE	N.D.	4
1,1-DICHLOROETHENE	N.D.	3
1,2-DICHLOROPROPANE	N.D.	3
CIS-1,3-DICHLOROPROPENE	N.D.	2
TRANS-1,3-DICHL'PROPENE	N.D.	3
ETHYL BENZENE	5.8	3
METHYLENE CHLORIDE	N.D.	5
sym-TETRACHL'ETHANE	N.D.	2
TETRACHLOROETHENE	N.D.	4
TOLUENE	N.D.	1
t-1,2-DICHLOROETHENE	N.D.	2
1,1,1-TRICHLO'ETHANE	N.D.	3
1,1,2-TRICHLO'ETHANE	N.D.	10
TRICHLOROETHENE	N.D.	3
TRICHL'FLUOROMETHANE	N.D.	6
VINYL CHLORIDE	N.D.	2
XYLENES	1,700	2

N.D. = Not detected TOTAL

1,710



SHRADER

Analytical and Consulting

LABORATORIES INC.

6-29-93 Inv # 011579

Sev 2

1000

Sev 8

60

1060

7-13-93

REPORT OF ANALYTICAL SERVICES

SUBMITTED TO:

GM TRUCK & BUS GROUP, DETROIT ASSEMBLY
601 PIQUETTE AVENUE
DETROIT, MICHIGAN 48202

ATTN: MR. THOMAS HENDERSON

We are pleased to provide the enclosed analytical results for the following sample(s). Should you have any questions regarding the methods and/or results, please feel free to write or call.

Customer sample : LIME & SODA PITS, 06/07/93
Sample description : WATER
Project # : C060
Analysis performed : WASTEWATER PARAMETERS
Date received : June 07, 1993
Date completed : June 23, 1993
Report date : June 24, 1993

Approved

G. Sudhakar Reddy, Ph.D.

Verified

Laura J. Bruske

Enclosure(s)

- Continued -

Project #C060

GM TRUCK & BUS GROUP, DETROIT ASSEMBLY
Sample(s) LIME & SODA PITS 06/07 & 06/08/93 - WATER

June 24, 1993

Page 2

ANALYTICAL PROCEDURE :

A grab sample of water was collected from a HOLDING TANK at GMC TRUCK & BUS at 601 Piquette in Detroit on June 7, 1993. The sample was transported to the laboratory where it was split and analyzed for numerous parameters as required for city compliance.

RESULTS :

Units are in milligrams/liter with the exception of pH and asbestos. Asbestos is in fibers/liter.

<u>PARAMETER</u>	<u>RESULTS</u>	<u>D.L.</u> ¹
pH	9.12	1
Biochemical oxygen demand	N.D. ²	4
Chemical oxygen demand	11	5
Suspended solids	10	3
Total residual chlorine	N.D.	0.2
Chloride	2	1
Chromium VI	N.D.	0.015
Cyanide	N.D.	0.020
Fluoride	N.D.	0.20
MBAS	0.06	0.04

- Continued -

Project #C060

GM TRUCK & BUS GROUP, DETROIT ASSEMBLY
Sample(s) LIME & SODA PITS 06/07 & 06/08/93 - WATER

June 24, 1993

Page 3

R E S U L T S : (cont'd)

<u>PARAMETER</u>	<u>RESULTS</u>	<u>D.L.</u>
Nitrogen, Kjeldahl	0.3	0.2
Nitrogen, Ammonia	N.D.	0.2
Nitrogen, Nitrate	0.09	0.02
Nitrogen, Nitrite	N.D.	0.02
Oil & grease	N.D.	0.5
Phenols	N.D.	0.005
Phosphorus	0.04	0.04
Sulfate	N.D.	5
Sulfite	N.D.	2.0
Sulfide	N.D.	0.10
Aluminum	0.3	0.2
Antimony	N.D.	0.008
Arsenic	N.D.	0.004
Barium	N.D.	0.05
Beryllium	N.D.	0.005
Cadmium	N.D.	0.002
Calcium	7.7	1.0
Chromium	N.D.	0.050
Copper	0.048	0.005

- Continued -

Project #C060

GM TRUCK & BUS GROUP, DETROIT ASSEMBLY
Sample(s) LIME & SODA PITS 06/07 & 06/08/93 - WATER

June 24, 1993

Page 4


R E S U L T S : (cont'd)

<u>PARAMETER</u>	<u>RESULTS</u>	<u>D.L.</u>
Iron	0.50	0.05
Lead	N.D.	0.05
Manganese	0.02	0.02
Mercury	0.0010	0.0002
Nickel	N.D.	0.05
Potassium	N.D.	0.5
Selenium	N.D.	0.008
Silver	N.D.	0.005
Thallium	N.D.	0.004
Zinc	0.064	0.005
Asbestos fibers	1,500,000	375,000

¹D.L. = Detection Limit

²N.D. = Not Detected

MLS/rac





SHRADER

Analytical and Consulting

LABORATORIES INC.

REPORT OF ANALYTICAL SERVICES

SUBMITTED TO:

GM TRUCK & BUS GROUP, DETROIT ASSEMBLY
601 PIQUETTE AVENUE
DETROIT, MICHIGAN 48202

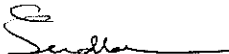
ATTN: MR. THOMAS HENDERSON

We are pleased to provide the enclosed analytical results for the following sample(s). Should you have any questions regarding the methods and/or results, please feel free to write or call.

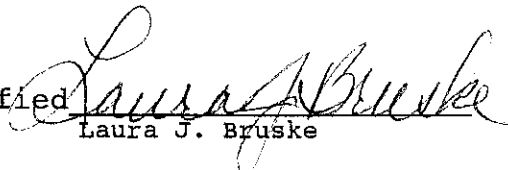
Customer sample : COMPOSITES OF RINSATE DRUMS
Sample description : OIL/WATER
Project # : C059

Analysis performed : GC, AA & STANDARD METHODS
Date received : June 07, 1993
Date completed : June 28, 1993
Report date : June 29, 1993

Approved


G. Sudhakar Reddy, Ph.D.

Verified


Laura J. Bruske

Enclosure(s)

- Continued -

Project #C059

GM TRUCK & BUS GROUP, DETROIT ASSEMBLY
Sample(s) COMPOSITES OF RINSATE DRUMS

June 29, 1993

Page 2

S A M P L I N G D E T A I L :

On Monday, June 7, 1993, grab samples were taken from four of 15 drums labelled PAD RINSATE at GM TRUCK & BUS on Piquette Avenue in Detroit. These four drums were composited and labelled SL #C05901.

On Tuesday, June 8, 1993, grab samples were taken from the remaining 10 drums, composited and labelled SL #C05902. Both composites consisted of oil and water.

A N A L Y T I C A L P R O C E D U R E :

Sample SL #C05901 was analyzed for ten Michigan RCRA metals using atomic absorption spectroscopy.

The oil layer only of SL #C05902 was analyzed for polychlorinated biphenyls (PCBs) using gas chromatography. The specific gravity of the oil was measured and its flash point taken.

The combined oil and water layers of C05902 were analyzed for Michigan RCRA metals using atomic absorption spectroscopy.

- Continued -

Project #C059

GM TRUCK & BUS GROUP, DETROIT ASSEMBLY
Sample(s) COMPOSITES OF RINSATE DRUMS

June 29, 1993

Page 3

R E S U L T S :

SL #C05901 - PAD RINSATE COMPOSITE OF 4 DRUMS

<u>PARAMETER</u>	<u>RESULT</u>	<u>D.L.¹</u>	<u>UNITS</u>
Arsenic	0.014	0.004	mg/L
Barium	0.12	0.05	mg/L
Cadmium	0.035	0.002	mg/L
Chromium	N.D. ²	0.250	mg/L
Copper	0.618	0.005	mg/L
Lead	N.D.	0.250	mg/L
Mercury	N.D.	0.01	mg/L
Selenium	0.010	0.008	mg/L
Silver	N.D.	0.025	mg/L
Zinc	42.4	0.005	mg/L

¹D.L. = Detection Limit

²N.D. = Not Detected

-Continued-

Project #C059

GM TRUCK & BUS GROUP, DETROIT ASSEMBLY
Sample(s) COMPOSITES OF RINSATE DRUMS

June 29, 1993

Page 4

R E S U L T S : (cont'd)

SL #C05902 - 10 DRUM COMPOSITE **OIL & WATER**

<u>PARAMETER</u>	<u>RESULT</u>	<u>D.L.</u>	<u>UNITS</u>
Arsenic	N.D.	0.010	mg/L
Barium	0.14	0.05	mg/L
Cadmium	0.035	0.002	mg/L
Chromium	N.D.	0.250	mg/L
Copper	2.08	0.005	mg/L
Lead	0.282	0.05	mg/L
Mercury	0.0391	0.0002	mg/L
Selenium	N.D.	0.010	mg/L
Silver	N.D.	0.025	mg/L
Zinc	54.8	0.005	mg/L

OIL ONLY :

PCB 1016	N.D.	5.0	mg/Kg
PCB 1221	N.D.	5.0	mg/Kg
PCB 1232	N.D.	5.0	mg/Kg
PCB 1242	N.D.	5.0	mg/Kg
PCB 1248	N.D.	5.0	mg/Kg
PCB 1254	N.D.	5.0	mg/Kg
PCB 1260	N.D.	5.0	mg/Kg
Flash point	>160	160	°F
Specific Gravity	0.899	0.01	---

MLS/rac





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

December 9, 1993

RECEIVED DEC 17 1993
WMD RCRA
RECORD CENTER

Mr. Tom Henderson
General Motors Truck and Bus Operations
Detroit Assembly Plant
601 Piquette
Detroit, MI 48202

Re: Visual Site Inspection
General Motors Truck and Bus Operations
Detroit Assembly Plant
Detroit, MI
MID 076 380 583

Dear Mr. Henderson:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**GENERAL MOTORS CORPORATION -
NORTHERN AMERICAN TRUCK PLATFORMS
(FORMERLY GENERAL MOTORS CORPORATION -
TRUCK AND BUS GROUP)
DETROIT, MICHIGAN
MID 076 380 583**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	MID 076 380 583
Date Prepared	:	November 19, 1993
Contract No.	:	68-W9-0006
PRC No.	:	309-R05032MI56
Prepared by	:	PRC Environmental Management, Inc. (Mary Joyce Freibert)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the General Motors Corporation - Northern American Truck Platforms (GMC-NATP) facility in Detroit, Wayne County, Michigan. The facility was formerly General Motors Corporation - Truck and Bus Group (GMC-TBG). This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

In 1919, General Motors Corporation-Fisher Body (GMC-FB) purchased about 13 acres of undeveloped land, which is currently the GMC-NATP facility. GMC-FB manufactured preliminary patterns in the form of wood that were used in the manufacturing of steel dies. The steel dies were shipped off site and used in sheet metal stamping mills. In 1973, the GMC-FB facility changed its name to General Motors Corporation - Assembly Division (GMC-AD) and its operations to assembling truck chassis that required metal cleaning and painting. In 1974, GMC-AD changed its name to General Motors Corporation - Chevrolet Plant (GMC-CP) and facility operations remained the same. In 1984, GMC-CP changed its name to GMC-TBG and facility operations remained the same. In 1987, the facility discontinued its metal cleaning process and painting operations. In 1993, GMC-TBG changed its name to General Motors Corporation - North American Truck Platforms (GMC-NATP) and facility operations currently consist of the truck chassis assembly only.

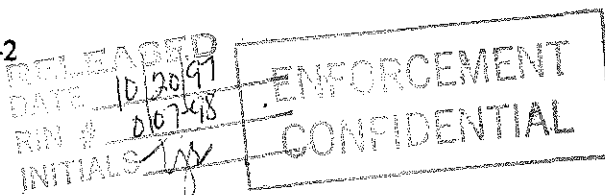
Between 1919 and 1973, GMC-FB manufactured preliminary patterns in the form of wood that were used in the manufacturing of steel dies. The steel dies were shipped off site and used in sheet metal stamping mills. According to a facility representative, the GMC-FB facility may have generated nonhazardous sawdust, scrap metal, and used oil. Hazardous waste streams generated by the GMC-FB facility are unknown. In 1973, GMC-AD changed its operations to the assembly of truck chassis that required metal cleaning and painting. From 1973 until 1987, the metal cleaning process consisted of a phosphating line with three 100-gallon tanks for cleaning, phosphating, and rinsing the metal. The phosphating line generated a nonhazardous phosphating rinsewater and phosphating sludge. From 1973 until 1987, the facility's painting operations generated the following hazardous wastes: spent solvent consisting of a mixture of methylene chloride, toluene, and methanol (D001,

F001, F002, and F005), paint sludge (D008 and 003D), paint sludge liquid (D008 and 003D), spent methylene chloride (F001 and F002), spent toluene (F005), discarded methylene chloride (U080) discarded toluene (U220), and discarded methanol (U154). The waste code 003D is a Michigan Department of Natural Resources (MDNR) waste code for zinc. Nonhazardous waste streams included paint chips and paint wastewater. From 1973 until 1991, nonhazardous rinsewater and lime sludge were generated from the facility's boilers' blowdown. The facility currently generates spent diesel fuel (D001) from erroneous filling of the trucks fuel tanks. The facility is currently generating asbestos from the facility's abatement programs in the powerhouse. In 1993, the facility had a one-time generation of caustic wastewater from cleaning the concrete pad of the Former West Gondola Storage Pad (SWMU 2) and the Former Central Gondola Storage Pad (SWMU 3). At the time of the PA/VSI, the facility had not determined if the caustic wastewater contained hazardous constituents. Nonhazardous used oil is generated from maintenance of equipment when changing oil in various machinery.

The GMC-NATP facility currently employs about 500 people working one 8-hour shift, five days per week. The facility consists of one assembly building with three floors and three parking lots. The GMC-NATP facility access is controlled by 24-hour security guards, cameras, and an 8-foot chain-link fence with barbed wire.

GMC-CP submitted a Notification of Hazardous Waste Activity form to EPA on August 20, 1980. The notification stated that the facility was operating as a large-quantity generator of hazardous waste and as a treatment, storage, or disposal (TSD) facility. GMC-CP submitted a RCRA Part A permit application on November 18, 1980. The RCRA Part A permit application specified the following estimated annual generation rates and process codes: 15,600 pounds of container storage (S01) for F017 waste code and 200 pounds of container storage (S01) and tank treatment (T01) for F007, F008, and F009 waste codes. The permit also specified a container storage (S01) capacity of 12,000 gallons and a tank treatment (T01) capacity of 20 gallons per day. The container storage (S01) refers to the Former East Container Storage Area (CSA) (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). According to a facility representative, the facility never treated hazardous wastes in tanks; therefore, the process code for tank treatment (T01) was apparently a protective filing.

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In October 1982, GMC-CP requested the withdrawal of its Part A permit application because F007, F008, and F009 waste codes were changed to include only waste containing cyanide, which the facility never generated. Also, paint sludges (F017) were delisted on January 16, 1981. In March 1983, EPA informed GMC-CP that it was not required to have a Part A permit application and that it qualified as a small-quantity generator of hazardous waste only. In April 1984, GMC-TBG requested the renewal of its Part A permit application because changes in the facility's processes no longer allowed the facility to meet the criteria of a small-quantity generator of hazardous waste only.

In April 1986, GMC-TBG again requested the withdrawal of its Part A permit application because of changes in the facility's processes and waste minimization practices. In May 1986, GMC-TBG submitted a revised Notification of Hazardous Waste Activity form to EPA. The notification stated that the facility was operating as a generator of hazardous waste only. In June 1986, EPA informed GMC-TBG that according to EPA files, the facility had stored hazardous waste for greater than 90 days, and therefore, the facility was considered a TSD facility.

In 1986, MDNR requested the submittal of a closure plan for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). The facility submitted a closure plan for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). In December 1986, MDNR requested additional information regarding the closure of the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). In December 1987, GMC-TBG submitted a revised closure plan to MDNR.

After a 30-day public comment period, MDNR received no comments on the revised closure plan. Therefore, in January 1988, MDNR approved the revised closure plan on the condition that GMC-TBG would conduct additional soil sampling if necessary after the removal of soil. However, during closure activities, the removal of soil was not required because analytical results of the soil samples from the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3) did not contain hazardous constituents above background levels for soil. Therefore, additional soil sampling also was not conducted. Between July 1988 and October 1988, GMC-TBG completed closure activities according to the revised closure

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plan. In October 1988, GMC-TBG submitted to MDNR the closure certification for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3) and in June 1989, submitted additional information regarding the closure to MDNR. In August 1989, MDNR approved the closure certification of the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3).

The PA/VSI identified the following 12 SWMUs and 1 AOC at the facility:

Solid Waste Management Units

1. Former East CSA
2. Former West Gondola Storage Pad
3. Former Central Gondola Storage Pad
4. Former Spent Solvent Satellite Accumulation Areas (SAA)
5. Former Container Accumulation Area (CAA)
6. Trash Compactor
7. Lime Wastewater Holding Tank
8. Current CSA
9. Asbestos CSA
10. Nonhazardous CSA
11. Used Oil Accumulation Areas
12. 800-Gallon Used Oil Aboveground Storage Tank (AST)

Areas of Concern

1. Product Diesel Fuel ASTs

SWMUs 7 and 12 pose a low to moderate potential for release to on-site soils because SWMU 7 is about 20 years old, constructed of a unknown material, and the water may contain hazardous constituents and SWMU 12 is not covered and is not properly managed because of the puddles of used oil surrounding the unit. SWMUs 7 and 12 pose a low potential for release to groundwater, surface water, and air.

AOC 1 poses a moderate potential for release to groundwater and on-site soils because one AST appears to have leaked a hazardous product material and the vegetation surrounding the ASTs appears to be stressed. AOC 1 poses a low potential for release to surface water and air.

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SWMUs 1, 2, and 3 pose a low potential for release to all environmental media because the units are inactive, were RCRA closed, and no documented releases have occurred.

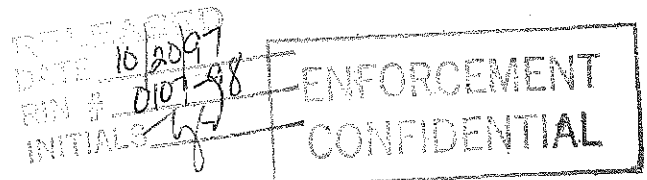
SWMUs 4 and 5 pose a low potential for release to all environmental media because the units are inactive, were located on a concrete floor, and no documented releases have occurred.

SWMUs 6, 8, 9, 10, and 11 pose a low potential for release to all environmental media because the units have release controls, no documented releases have occurred, and they appear to be properly managed.

Sensitive environments are not located on site. No sensitive environments lie within 2 miles of the facility. The nearest surface water body, the Detroit River, is located 3.5 miles south of the facility and supplies municipal water to Detroit. The nearest residence is located within 0.5 mile southeast of the facility. The facility does not have an National Pollutant Discharge Elimination System (NPDES) permit to discharge to surface water. Storm water runoff from the facility collects on the paved areas around the facility and flows into storm water drains. Storm water drains to the city sewer system and is processed in Detroit's publicly owned treatment works (POTW) before being discharged to the Detroit River. Groundwater is not used as a private water supply. No drinking water wells and industrial wells are located within 3 miles of the facility. The facility has no on-site industrial water wells.

PRC recommends the facility identify the source of the milky white sheen, seal the underground pipes, and properly dispose of the contents in the Lime Wastewater Holding Tank (SWMU 7). Also, the facility should cover the 800-Gallon Used Oil AST (SWMU 12) and practice better waste management techniques. PRC recommends that the facility conduct soil sampling for organic constituents and total petroleum hydrocarbons (TPH) at the Product Diesel Fuel ASTs (AOC 1) to determine if releases have occurred.

PRC recommends no further action for the following SWMUs: the Former East CSA (SWMU 1), Former West Gondola Storage Pad (SWMU 2), Former Central Gondola Storage Pad (SWMU 3), Former Spent Solvent SAAs (SWMU 4), Former CAA (SWMU 5), Trash Compactor (SWMU 6),



Current CSA (SWMU 8), Asbestos CSA (SWMU 9), Nonhazardous CSA (SWMU 10), and Used Oil Accumulation Areas (SWMU 11).

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the General Motors Corporation - Northern American Truck Platforms (GMC-NATP), facility formerly General Motors Corporation - Truck and

Bus Group (GMC-TBG), (EPA Identification No. MID 076 380 583) in Detroit, Wayne County, Michigan. The PA was completed on May 13, 1993. PRC gathered and reviewed information from the Michigan Department of Natural Resources (MDNR) and from EPA Region 5 RCRA files. Additional sources of information were obtained from the Federal Emergency Management Agency (FEMA), the National Oceanic and Atmospheric Administration (NOAA), the U.S. Department of Commerce (DOC), the U.S. Department of Agriculture (USDA), the U.S. Geological Survey (USGS), and the U.S. Department of Interior (DOI). The VSI was conducted on June 3, 1993. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified 12 SWMUs and 1 AOC at the facility.

The VSI is summarized and 15 of the 19 inspection photographs taken are included in Appendix A. The photographs have been renumbered; thus, their numbers differ from the photograph numbers in the VSI field notes, which are included in Appendix B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The GMC-NATP facility is located at 601 Piquette Road in Detroit, Wayne County, Michigan. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 42°22'09" N and longitude 83°03'53" W). The facility occupies 13 acres in an industrial area.

The facility is bordered on the north by Grand Trunk Railway, on the west by a retail meat market, on the south by Cameo Paint Company and an abandoned building, and on the east by Interstate I-75 and Commercial Carrier, Inc.

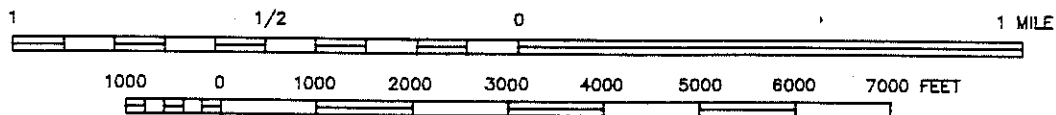
2.2 FACILITY OPERATIONS

In 1919, General Motors Corporation-Fisher Body (GMC-FB) purchased about 13 acres of undeveloped land, which is currently the GMC-NATP facility. GMC-FB manufactured preliminary patterns in the form of wood that were used in the manufacturing of steel dies. The steel dies were shipped off site and used in sheet metal stamping mills. In 1973, the GMC-FB facility changed its name to General Motors Corporation - Assembly Division (GMC-AD). Operations changed to truck chassis assembly that required metal cleaning and painting. In 1974, GMC-AD changed its name to General Motors Corporation - Chevrolet Plant (GMC-CP) and facility operations remained the same. In 1984, GMC-CP changed its name to GMC-TBG and facility operations remained the same. In 1987, the facility discontinued its metal cleaning process and painting operations. In 1993, GMC-TBG changed its name to GMC-NATP and current facility operations consist of the truck chassis assembly only.



FACILITY LOCATION

SCALE 1:24000



SCALE: 1" = 2,000'



GMC-NORTHERN AMERICAN TRUCK PLATFORMS
DETROIT, MICHIGAN

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: MODIFIED FROM USGS, HIGHLAND PARK AND
DETROIT, MICHIGAN QUADRANGLES, 1963, 1980

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The facility currently manages waste at a Trash Compactor (SWMU 6), a Lime Wastewater Holding Tank (SWMU 7), a less than 90-day Current Container Storage Area (CSA) (SWMU 8), an Asbestos CSA (SWMU 9), a Nonhazardous CSA (SWMU 10), the Used Oil Accumulation Areas (SWMU 11), and an 800-Gallon Used Oil Aboveground Storage Tank (AST) (SWMU 12). The facility formerly had a Former East CSA (SWMU 1), a Former West Gondola Storage Pad (SWMU 2), a Former Central Gondola Storage Pad (SWMU 3), the Former Spent Solvent Satellite Accumulation Areas (SAA) (SWMU 4), and a Former Container Accumulation Area (CAA) (SWMU 5).

The GMC-NATP facility currently employs about 500 people working one 8-hour shift, five days per week. The facility consists of one assembly building with three floors and three parking lots. The GMC-NATP facility access is controlled by security guards 24-hour per day, cameras, and an 8-foot chain-link fence with barbed wire.

Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

This section describes waste generation and management at the GMC-NATP facility. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

Between 1919 and 1973, GMC-FB manufactured tool and pattern dies for stamping mills. According to a facility representative, the GMC-FB facility may have generated nonhazardous sawdust, scrap metal, and used oil. The quantities generated and disposition of these nonhazardous wastes are unknown. It is also unknown where these nonhazardous wastes were managed. Hazardous waste streams generated by the GMC-FB facility are unknown.

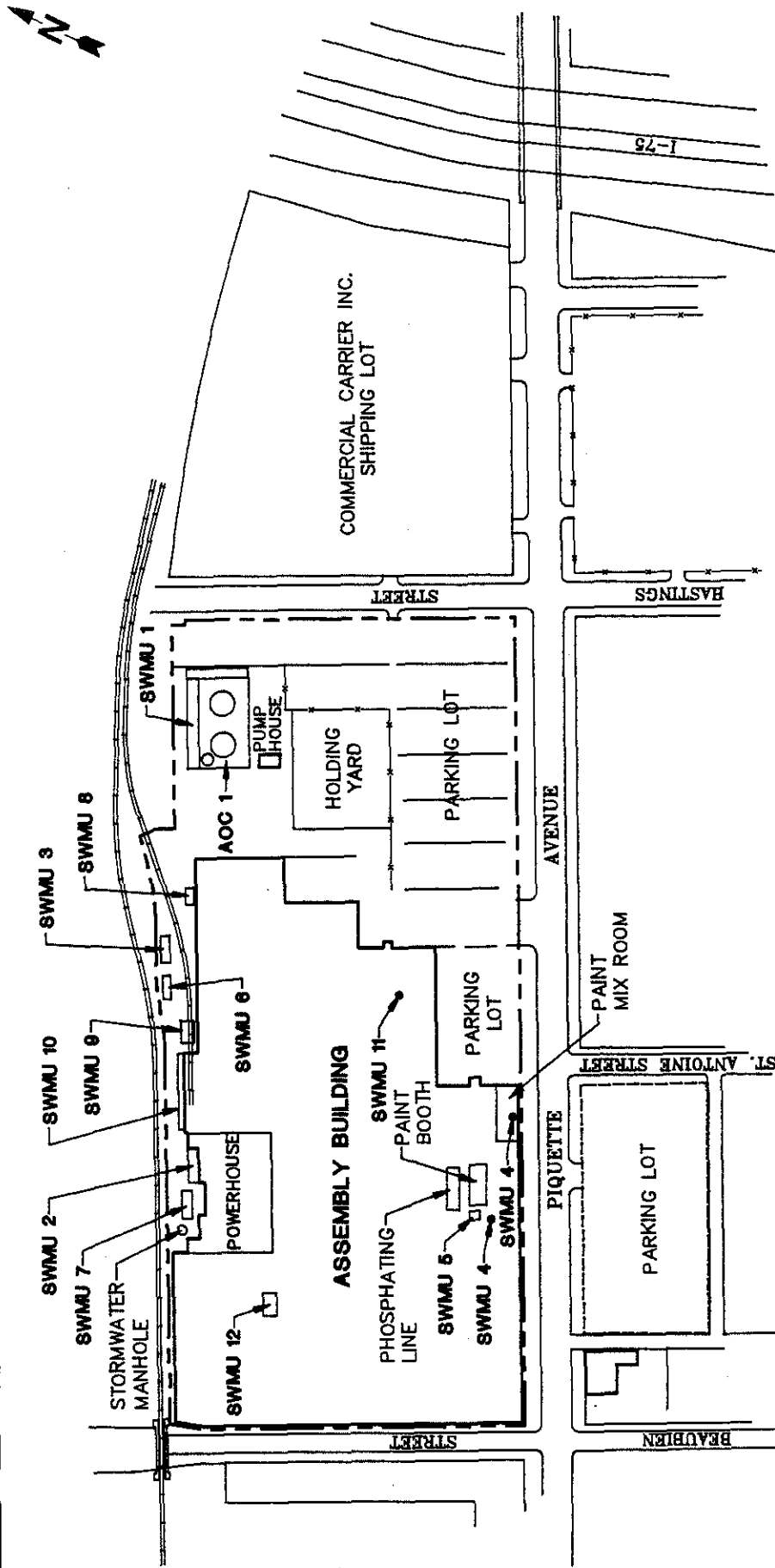
In 1973, GMC-AD operations included truck chassis assembly that required metal cleaning and painting. From 1973 until 1987, the metal cleaning process consisted of a phosphating line with three

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Former East CSA	Yes	Inactive; RCRA closed in August 1989
2	Former West Gondola Storage Pad	Yes	Inactive; RCRA closed in August 1989
3	Former Central Gondola Storage Pad	Yes	Inactive; RCRA closed in August 1989
4	Former Spent Solvent SAAs	No	Inactive
5	Former CAA	No	Inactive
6	Trash Compactor	No	Active; storage of nonhazardous waste
7	Lime Wastewater Holding Tank	No	Active; storage of nonhazardous waste
8	Current CSA	No	Active; less than 90-day storage of hazardous waste
9	Asbestos CSA	No	Active; storage of nonhazardous waste
10	Nonhazardous CSA	No	Active; storage of nonhazardous waste
11	Used Oil Accumulation Areas	No	Active; accumulation of nonhazardous waste
12	800-Gallon Used Oil AST	No	Active; storage of nonhazardous waste

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



SOLID WASTE MANAGEMENT UNITS

- SWMU 1 FORMER EAST CSA
- SWMU 2 FORMER WEST GONDOLA STORAGE PAD
- SWMU 3 FORMER CENTRAL GONDOLA STORAGE PAD
- SWMU 4 FORMER SPENT SOLVENT SAAs
- SWMU 5 FORMER CAA
- SWMU 6 TRASH COMPACTOR
- SWMU 7 LIME WASTEWATER HOLDING TANK
- SWMU 8 CURRENT CSA
- SWMU 9 ASBESTOS CSA
- SWMU 10 NONHAZARDOUS CSA
- SWMU 11 USED OIL ACCUMULATION AREAS
- SWMU 12 800-GALLON USED OIL AST

AREA OF CONCERN

- AOC 1 PRODUCT DIESEL FUEL ASTs

LEGEND

- CSA CONTAINER STORAGE AREA
- SAA SATELLITE ACCUMULATION AREA
- CAA CONTAINER ACCUMULATION AREA
- AST ABOVEGROUND STORAGE TANK

GMC-NORTHERN AMERICAN TRUCK PLATFORMS
DETROIT, MICHIGAN

FIGURE 2

FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: MODIFIED FROM GMC-NORTHERN AMERICAN TRUCK PLATFORMS SKETCH RECEIVED BY PRC ON JUNE 3, 1993. NOT TO SCALE.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit^{b, c}</u>
Sawdust/NA	Manufacture of tool and pattern dies	Unknown
Scrap metal/NA	Manufacture of tool and pattern dies	Unknown
Used oil/NA	Manufacture of tool and pattern dies	Unknown
Phosphating rinsewater/NA	Phosphating line	None
Phosphating sludge/NA	Phosphating line	SWMUs 1 and 8
Spent solvent/D001, F001, F002, and F005	Painting operations	SWMUs 1 and 4
Paint sludge/D008 and 003D ^d	Painting operations	SWMUs 2, 3, and 5
Paint sludge liquid/D008 and 003D ^d	Painting operations	SWMU 1
Spent methylene chloride/F001 and F002	Painting operations	SWMU 1
Spent toluene/F005	Painting operations and cleaning truck chassis lines	SWMUs 1 and 8
Discarded methylene chloride/U080	Painting operations	SWMU 1
Discarded toluene/U220	Painting operations	SWMU 1
Discarded methanol/U154	Painting operations	SWMU 1
Paint chips/NA	Painting operations	SWMU 6
Paint wastewater/NA	Painting operations	None
Spent diesel fuel/D001	Excess product material from filling truck's gasoline tank	SWMUs 1 and 8

**TABLE 2 (Continued)
SOLID WASTES**

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit^{b, c}</u>
Lime wastewater/NA	Blowdown from boilers	SWMU 7
Lime sludge/NA	Blowdown from boilers	SWMU 7
Asbestos ^e /NA	Powerhouse	SWMU 9
Caustic wastewater/ND ^f	Cleaning concrete pad	SWMU 10
Used oil/NA	Maintenance of equipment	SWMUs 11 and 12

Notes:

- ^a Not applicable (NA) designates nonhazardous waste.
- ^b "None" indicates that the waste stream is not managed on site.
- ^c "Unknown" indicates that the waste was generated at the facility but that the SWMU that managed the waste cannot be determined.
- ^d "003D" is the MDNR waste code for zinc.
- ^e Waste is regulated under the Toxic Substances Control Act.
- ^f Not determined.

100-gallon tanks for cleaning, phosphating, and rinsing the metal. The phosphating line generated a nonhazardous phosphating rinsewater and phosphating sludge. From 1973 until 1987, the phosphating rinsewater was discharged directly from the phosphating line to Detroit's publicly owned treatment works (POTW). Until 1985, the phosphating sludge was stored in 55-gallon steel drums for greater than 90 days in the Former East CSA (SWMU 1). From 1985 until 1987, the phosphating sludge was stored for less than 90 days in the Current CSA (SWMU 8). The quantities generated and disposition of these nonhazardous wastes are unknown. According to a facility representative, no current employees at the facility have knowledge of this former process.

From 1973 until 1987, the facility's painting operations generated the following hazardous wastes: spent solvent (D001, F001, F002, and F005), paint sludge (D008 and 003D), paint sludge liquid (D008 and 003D), spent methylene chloride (F001 and F002), spent toluene (F005) discarded toluene (U220), discarded methylene chloride (U080), and discarded methanol (U154). From 1973 until present, the facility also generates spent toluene (F005) from cleaning the truck chassis line. Nonhazardous waste streams included paint chips and paint wastewater.

From 1973 until 1987, solvent consisting of either methylene chloride, toluene, or methanol was used in the cleaning of paint lines and paint equipment. Spent solvent consisting of a mixture of methylene chloride, toluene, and methanol (D001, F001, F002, and F005) was accumulated in a 55-gallon steel drum at the Former Spent Solvent SAAs (SWMU 4). When the drum was full, it was moved to the Former East CSA (SWMU 1) for greater than 90-day storage. GMC-TBG generated about 1,500 gallons of this waste annually. The spent solvent was transported off site to Petro-Chem, Inc. (Petro-Chem), in Detroit, Michigan, for fuel blending.

From 1973 until 1985, the facility used paints containing lead (D008) and zinc (003D) in its painting operations. The waste code 003D is a MDNR waste code for zinc. From 1985 until 1987, the facility discontinued using paints with lead and zinc. The GMC-TBG facility generated paint sludge (D008 and 003D) and paint sludge liquid (D008 and 003D) from the spray paint booth's water curtain. GMC-TBG skimmed paint sludge from a 2800-gallon process tank and transferred it to a 1-cubic yard Former CAA (SWMU 5) located near the paint booth. When the Former CAA was full, the paint sludge was transferred to a 20-cubic-yard roll-off container. From 1973 until 1984, the paint sludge was stored for greater than 90 days in a 20-cubic-yard roll-off container in the Former

West Gondola Storage Pad (SWMU 2). From 1984 until 1987, the paint sludge was stored for greater than 90 days in a 20-cubic-yard roll-off container in the Former Central Gondola Storage Pad (SWMU 3).

From 1973 until 1987, the paint sludge liquid was placed in a 55-gallon steel drum from the 2800-gallon holding tank and moved immediately to the Former East CSA (SWMU 1) for greater than 90-day storage.

From 1973 until 1980, the quantities generated and disposition of paint sludge and paint sludge liquid are unknown. From 1980 until 1985, the facility annually generated about 101,500 pounds of paint sludge and 2,900 gallons of paint sludge liquid and these wastes were transported off-site to Michigan Disposal in Belleville, Michigan, for disposal. From 1985 until 1987, the facility discontinued using paints with lead and zinc; therefore, these wastes were considered nonhazardous wastes. From 1985 until 1987, the quantities generated were the same as the 1980 to 1985 annual rates; however, the disposition of these wastes is unknown.

Paints used in the painting operations contained methylene chloride, toluene, and methanol. Spent methylene chloride (F001 and F002) and spent toluene (F005) were generated from cleaning the paint lines. Spent methylene chloride and spent toluene were placed in 55-gallon steel drums and were immediately moved to the Former East CSA (SWMU 1) for greater than 90-day storage. According to a facility representative, these hazardous wastes were generated in volumes of about 55 gallons at a time. From 1973 until 1980, the quantities generated and disposition of these wastes are unknown. From 1980 until 1987, the facility generated about 2,800 gallons of spent methylene chloride. The facility currently generates about 1,375 gallons of spent toluene from cleaning the truck chassis line. Spent toluene is currently stored for less than 90 days in the Current CSA (SWMU 8). Spent methylene chloride was transported off site to Michigan Disposal, in Belleville, Michigan, for disposal. Spent toluene is transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

Discarded methylene chloride (U080), discarded toluene (U220), and discarded methanol (U154) were generated because of excess product not used in the facility's painting operations. These wastes were stored in 55-gallon steel drums for greater than 90 days in the Former East CSA (SWMU 1). From 1980 until 1987, these wastes were generated periodically. The facility generated about 1,500 gallons

of discarded methylene chloride, 715 gallons of discarded toluene, and 55 gallons of discarded methanol, annually. These wastes were transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

From 1973 until 1987, nonhazardous paint chips were generated periodically as excess paint dried after painting operations. Paint chips were collected from the paint booth and immediately transferred to the Trash Compactor (SWMU 6). The quantities generated and disposition of this waste are unknown.

From 1973 until 1987, nonhazardous paint wastewater was generated from the facility's painting operations. The painting operations consisted of an overspray water curtain with a 2800-gallon process tank. When the paint wastewater became spent, it was periodically discharged to Detroit's POTW from the 2800-gallon process tank. According to a facility representative, the paint wastewater was analyzed for hazardous constituents prior to being discharged to Detroit's POTW; however, PRC found no documentation of this during federal, state, and local file reviews. The facility also had no documentation of the analytical results of this waste. The quantity of this waste generated is unknown.

The facility uses diesel fuel or unleaded gasoline as fuel for the truck chassis. Spent diesel fuel (D001) is generated when an employee fills a truck's fuel tank with the incorrect type of fuel. The spent diesel fuel is pumped into a 55-gallon steel drum. From 1973 until 1987, the 55-gallon steel drum was immediately moved to the Former East CSA (SWMU 1). The 55-gallon steel drums are currently stored in the less than 90-day Current CSA (SWMU 8). The facility generates about 500 gallons of this waste annually. The waste is transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

From 1973 until 1991, nonhazardous lime wastewater and lime sludge were generated from blowdown of the facility's boilers. According to a facility representative, in 1991, the facility discontinued using the boilers that are located in the facility's powerhouse. The lime wastewater and lime sludge were held in the underground Lime Wastewater Holding Tank (SWMU 7). The nonhazardous lime wastewater was discharged to the stormwater and sanitary sewer system. The nonhazardous lime sludge was removed periodically and sent off site to a pug mill in Detroit,

Michigan, for dewatering and recovery of lime. During the VSI, PRC noted a milky white sheen on the water in the storm water manhole near the Lime Wastewater Holding Tank (SWMU 7). Two of the three lids for the Lime Wastewater Holding Tank were removed and water in the tank had the same milky white sheen. Facility representatives did not know the size of the Lime Wastewater Holding Tank (SWMU 7); however, the holding tank is about 20 years old.

Asbestos abatement activities are currently being conducted at the facility. Asbestos is regulated under the Toxic Substances Control Act and is not considered a hazardous waste under RCRA regulations. Asbestos is removed from the powerhouse and is stored in a 20-cubic-yard roll-off box at the Asbestos CSA (SWMU 9). The asbestos is transported off site to U.S. Pollution Control Industries in East Chicago, Indiana, for disposal.

In 1993, the facility had a one-time generation of caustic wastewater from cleaning the concrete pad of the Former West Gondola Storage Pad (SWMU 2) and the Former Central Gondola Storage Pad (SWMU 3). At the time of the PA/VSI, the caustic wastewater was stored in 15 55-gallon steel drums in the Nonhazardous CSA (SWMU 10). According to a facility representative, the caustic wastewater is being analyzed to determine if it contains hazardous constituents. Disposition of this waste is contingent upon analytical results.

Nonhazardous used oil is generated from maintenance of equipment when changing oil in various machinery. The used oil is accumulated in 55-gallon steel drums at the Used Oil Accumulation Areas (SWMU 11) located throughout the facility. When a drum is full, it is transferred to the 800-Gallon Used Oil AST (SWMU 12). The facility generates about 96,000 gallons of this waste annually. This waste is transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to groundwater, surface water, air, and on-site soils at the facility. The facility has had two releases to surface water and two releases to air.

In December 1983, a heat exchanger on one of the product ASTs that contained fuel oil developed a leak. The heat exchanger is steam operated and the condensate return line drains to the Detroit city

sewer system. GMC-TBG released about 50 gallons of fuel oil to the Detroit city sewer system. The Detroit city sewer system empties into the Detroit River after being processed in Detroit's POTW. GMC-TBG notified MDNR, U.S. Coast Guard, and City of Detroit's POTW. The heat exchanger was immediately shut down and was repaired. It appears that no further action was required (MDNR 1983).

In April 1986, relief valves on the unleaded gasoline USTs were not properly opened, causing an overflow of gasoline from the vent pipe. The overflow of unleaded gasoline released about 250 gallons of unleaded gasoline to the Detroit city sewer system. The unleaded gasoline pumping system was immediately shut down. GMC-NATP contacted MDNR, City of Detroit's POTW, and the National Response Center. It appears that no further action was required (MDNR 1986a).

In 1991, GMC-TBG received two violation notices from the Wayne County Department of Health - Air Pollution Control Division for the malfunctioning of the powerhouse's burner and opacity meter. The violation notices were sent to the facility for exceeding its air permit limits for burning fuel oil. The malfunctions were corrected and it appears no further action was required (GMC-TBG 1991).

2.5 REGULATORY HISTORY

GMC-CP submitted a Notification of Hazardous Waste Activity form to EPA on August 20, 1980 (GMC-CP 1980a). The notification stated that the facility was operating as a large-quantity generator of hazardous waste and as a treatment, storage, or disposal (TSD) facility. GMC-CP submitted a RCRA Part A permit application on November 18, 1980 (GMC-CP 1980b).

The RCRA Part A permit application specified the following estimated annual generation rates and process codes: 15,600 pounds of container storage (S01) for F017 waste code and 200 pounds of container storage (S01) and tank treatment (T01) for F007, F008, and F009 waste codes. The permit also specified a container storage (S01) capacity of 12,000 gallons and a tank treatment (T01) capacity of 20 gallons per day. The container storage (S01) refers to the Former East CSA (SWMU 1), Former West Gondola Storage Pad (SWMU 2), and Former Central Gondola Storage Pad (SWMU 3). According to a facility representative, the facility never treated hazardous wastes in tanks; therefore, the process code for tank treatment (T01) was apparently a protective filing.

In October 1982, GMC-CP requested the withdrawal of its Part A permit application because F007, F008, and F009 waste codes were changed to include only waste containing cyanide which the facility never generated. Also, paint sludges (F017) were delisted on January 16, 1981 (GMC-CP 1982). In March 1983, EPA informed GMC-CP that it was not required to have a Part A permit application and that it qualified as a small-quantity generator of hazardous waste only (EPA 1983). In April 1984, GMC-TBG requested the renewal of its Part A permit application because of changes in the facility's processes no longer allowed the facility to meet the criteria of a small-quantity generator of hazardous waste only (GMC-TBG 1984).

In April 1986, GMC-TBG again requested the withdrawal of its Part A permit application because of changes in its processes and waste minimization practices within the facility (GMC-TBG 1986a). In May 1986, GMC-TBG submitted a revised Notification of Hazardous Waste Activity form to EPA. The notification stated the facility was operating as a generator of hazardous waste only (GMC-TBG 1986b). In June 1986, EPA informed GMC-TBG that according to its file, the facility had stored hazardous waste for greater than 90 days, and therefore, the facility was considered a TSD facility (EPA 1986).

In 1986, MDNR requested the submittal of a closure plan for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). The facility submitted a closure plan for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). In December 1986, MDNR requested additional information regarding the closure of the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3) (MDNR 1986b). In February 1987, GMC-TBG submitted a revised closure plan and additional information regarding the closure of the Former East CSA, the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3) (GMC-TBG 1987a). In December 1987, GMC-TBG submitted a revised closure plan to MDNR (GMC-TBG 1987b).

After a 30-day public comment period, MDNR received no comments on the revised closure plan. Therefore, in January 1988, MDNR approved the revised closure plan on the condition that

GMC-TBG conduct additional soil sampling if necessary after the removal of soil (MDNR 1988). However, during closure activities, the removal of soil was not required because analytical results of the soil samples from the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3) did not contain hazardous constituents above background levels for soil. Therefore, additional soil sampling was not conducted. Between July 1988 and October 1988, GMC-TBG completed closure activities according to the revised closure plan. In October 1988, GMC-TBG submitted to MDNR the closure certification for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). In June 1989, the facility submitted additional information regarding the closure to MDNR. In July 1989, MDNR informed GMC-TBG that the closure certification was inadequate and that GMC-TBG needed to submit additional information to MDNR (MDNR 1989a). In July 1989, GMC-TBG submitted the additional information and in August 1989, MDNR approved the closure certification for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3) (MDNR 1989b).

The facility is required to have operating air permits. GMC-NATP had three permits for the facility's boilers, vehicle exhaust, and painting operations. The facility currently has one permit for its vehicle exhaust. The facility has violated its air permits for the boilers exceeding its limit for burning fuel oil; however, the boiler malfunctions that caused the violations were corrected and it appeared no further action was required (GMC-TBG 1991). The facility has no history of odor complaints from area residents.

GMC-NATP facility had two unleaded gasoline 8000-gallon USTs and one transmission fluid 10000-gallon UST. The USTs were about 20 years old and constructed of fiberglass. In 1990 and 1991, the facility removed the three USTs. During a federal, state, and local file review, PRC found no documentation indicating that a release had occurred from the USTs or that a release was noted during the removal of the USTs. In 1991, the facility installed one 10000-gallon UST for unleaded gasoline.

The facility does not have an NPDES permit to discharge to surface water and has had no CERCLA activity.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and groundwater in the vicinity of the facility.

2.6.1 Climate

The climate in Wayne County is continental. The average daily temperature is 48.5 °F. The lowest average daily temperature is 16.1 °F in January. The highest average daily temperature is 83.1 °F in July (NOAA 1980).

The total annual precipitation for the county is 32 inches. The mean annual lake evaporation for the area is about 30 inches (DOC 1968). The 1-year, 24-hour maximum rainfall is about 2 inches. The prevailing wind is from the southeastern direction and has an average wind speed of 10.3 miles per hour.

Due to the topography of the area, moist air from the northwest dries before it reaches the Detroit area. Therefore, summer showers coming from the northwest often dissipate before reaching Detroit. The northwesterly winter winds bring snow to all of Michigan, but rarely in accumulations of measurable depth in the Detroit area. Winds from the southeast generally contain more moisture (NOAA 1980).

2.6.2 Flood Plain and Surface Water

The GMC-NATP facility is not located in a 100-year flood plain (FEMA 1981). The nearest surface water body, the Detroit River, is located 3.5 miles south of the facility and is used to supply municipal water to the City of Detroit. The facility does not have an NPDES permit to discharge to surface water. Storm water runoff from the facility collects on the paved areas around the facility and flows into storm water drains. Storm water drains to the city sewer system and is processed in Detroit's POTW before being discharged to the Detroit River.

2.6.3 Geology and Soils

No site-specific geology and soil information is available. The following paragraphs discuss the regional and soil setting of Wayne County. This information was obtained from a soil survey of Wayne County, Michigan (Mozola 1969).

The surface geology of the Detroit area is characterized by a mosaic of glacial and organic deposits. Present land forms are the result of Pleistocene Epoch glaciation and subsequent deposition and erosion. The present land forms primarily consist of materials deposited during the Cary substage of the Wisconsin Glaciation; however, the hardpan encountered just above the bedrock in downtown Detroit occupies part of an ancient glacial lake bed that slopes gently to a nearly flat terrain that has been incised by currently flowing rivers and streams. Glacial deposits over bedrock range in thickness from 120 to 200 feet in this area. These deposits consist mainly of layers of glacial till of varying thicknesses and a thick sequence of lacustrine clays and silts.

The bedrock of Detroit consists of about 830 feet of consolidated and cemented Middle Devonian limestone from the Paleozoic Era. This structural feature underlies all of Michigan and portions of neighboring states. Within this structural basin, sedimentary rocks dip at an angle of less than 1 degree toward the center of the basin, which is located beneath the central portion of the southern peninsula.

2.6.4 Groundwater

No site-specific groundwater information is available. The following paragraphs discuss the regional groundwater setting of Wayne County.

Groundwater in the area is generally encountered approximately 40 feet below ground surface (bgs). It generally flows southwest toward the Detroit River. However, because Detroit is located on a glacial lake plain composed primarily of silts and clays, the area is not favorable for the development of wells with moderate-to-large yields. Storage capacities are limited and well failures can be expected during long droughts (USGS 1989). Although the lake plain has a high frequency of dry holes, small domestic supplies within intermittent zones of relatively greater permeability than the

surrounding clay and silt deposits are normally possible. These intermittent zones occur under confined conditions, and both flowing and nonflowing wells can be expected. Southeast from the junction of the lake plain with the glacial moraines, the frequency, thickness, and extent of confined groundwater bearing zones decreases with proximity to the Detroit River.

Although the silt and clay deposits have limited ability to yield usable quantities of water, the shallow groundwater is usually soft and potable unless contaminated by human or industrial activities. In the intermittent zones described above, mineralization increases with depth. In addition, the quality of water from deep confined zones is often impaired by chlorides, hydrogen sulfide, and methane gas (Mozola 1969).

2.7 RECEPTORS

The facility occupies 13 acres in an industrial area in Detroit, Michigan. Detroit has a population of about 1,028,000.

The facility is bordered on the north by Grand Trunk Railway, on the west by a retail meat market, on the south by Cameo Paint Company and an abandoned building, and on the east by Interstate I-75 and Commercial Carrier, Inc. The nearest school, Salesian High School, is located about 0.25 mile southwest of the facility. The nearest residence is located within 0.5 mile southeast of the facility. Facility access is controlled by 24-hour security guards, cameras, and an 8-foot chain-link fence with barbed wire.

The nearest surface water body, the Detroit River, is located 3.5 miles south of the facility and is used to supply municipal water to the City of Detroit. The facility does not have an NPDES permit to discharge to surface water. Storm water runoff from the facility collects on the paved areas around the facility and flows into storm water drains. Storm water drains to the city sewer system and is processed in Detroit's POTW before being discharged to the Detroit River.

Groundwater is not used as a private water supply. No drinking water wells and industrial wells are located within 3 miles of the facility. The facility has no on-site industrial water wells (MDNR 1993).

Sensitive environments are not located on site. No sensitive environments lie within 2 miles of the facility (DOI 1978).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 12 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Former East CSA

Unit Description:

The unit was located outdoors north of the Product Diesel Fuel ASTs (AOC 1). The unit consisted of 55-gallon steel drums on metal racks erected about 5 feet above the dike area on soil, measured about 120 by 75 feet, and operated as a storage area for greater than 90 days of hazardous waste.

Date of Startup:

This unit began operation in 1973.

Date of Closure:

This unit is inactive and was RCRA closed in August 1989.

Wastes Managed:

This unit managed nonhazardous phosphating sludge, spent solvent consisting of a mixture of methylene chloride, toluene, and methanol (D001, F001, F002, and F005), paint sludge liquid (D008 and 003D), spent methylene chloride (F001 and F002), spent toluene (F005), discarded methylene chloride (U080), discarded toluene (U220), discarded methanol (U154), and spent diesel fuel (D001). The disposition of the nonhazardous phosphating sludge is unknown. The spent solvent, spent toluene, discarded methylene chloride, discarded toluene, and discarded methanol are transported off site to Petro-Chem, in Detroit, Michigan, for fuel blending. From 1980 until 1985, paint sludge liquid and spent methylene chloride were transported off site to Michigan Disposal, in Belleville, Michigan, for disposal. Prior to 1980 and from 1985 until 1987, the disposition of

these wastes are unknown. The spent diesel fuel is transported off site to Petro-Chem, in Detroit, Michigan, for fuel blending.

Release Controls: The unit was located outdoors on soil and had a 3-foot concrete berm surrounding it.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained no hazardous waste during the VSI. PRC noted no evidence of release (see Photograph No. 1).

SWMU 2 Former West Gondola Storage Pad

Unit Description: The unit was located outdoors north of the facility's powerhouse. The unit consisted of a 20-cubic-yard roll-off box container on a concrete pad, measured about 12 by 24 feet, and operated as a storage area for greater than 90 days of hazardous waste.

Date of Startup: This unit began operation in 1973.

Date of Closure: This unit is inactive and was RCRA closed in August 1989.

Wastes Managed: This unit managed paint sludge (D008 and 003D). From 1980 until 1985, paint sludge was transported off site to Michigan Disposal, in Belleville, Michigan, for disposal. Prior to 1980 and from 1985 until 1987, the disposition of this waste is unknown.

Release Controls: The unit was located outdoors on a concrete pad.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained no hazardous waste during the VSI. PRC noted no evidence of release (see Photograph No. 2).

SWMU 3 Former Central Gondola Storage Pad

Unit Description: The unit was located outdoors in the north-central area of the facility. The unit consisted of a 20-cubic-yard roll-off box container on a concrete pad, measured about 12 by 24 feet, and operated as a storage area for greater than 90 days of hazardous waste.

Date of Startup: This unit began operation in 1984.

Date of Closure: This unit is inactive and was RCRA closed in August 1989.

Wastes Managed: This unit managed paint sludge (D008 and 003D). From 1980 until 1985, paint sludge was transported off site to Michigan Disposal, in Belleville, Michigan, for disposal. Prior to 1980 and from 1985 until 1987, the disposition of this waste is unknown.

Release Controls: The unit was located outdoors on a concrete pad.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained no hazardous waste during the VSI. PRC noted no evidence of release (see Photograph No. 3).

SWMU 4 Former Spent Solvent SAAs

Unit Description: The unit was located indoors and consisted of two accumulation areas for hazardous waste that were located in the Paint Mix Room and near

the paint booth. Each area was on a concrete floor and measured about 4 by 4 feet.

Date of Startup: This unit began operation in 1973.

Date of Closure: This unit has been inactive since 1987.

Wastes Managed: This unit managed spent solvent consisting of a mixture of methylene chloride, toluene, and methanol (D001, F001, F002, and F005). The waste was transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

Release Controls: The unit was located indoors on a concrete floor.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained no hazardous waste during the VSI. The hazardous waste area in the Paint Mix Room contained one 55-gallon drum of product material. The concrete floor was wet from water that leaked into the room through holes in the bottom of the outside wall; however, PRC noted no evidence of a release (see Photograph No. 4). The hazardous waste area near the paint booth contained truck chassis. No cracks in the concrete floor or visible evidence of spills were observed (see Photograph No. 5).

SWMU 5

Former CAA

Unit Description: The unit was located indoors on a concrete floor that was near the paint booth. The unit consisted of a 1-cubic -yard container that measured about 8 by 10 feet, and operated as an accumulation area for hazardous waste.

Date of Startup: This unit began operation in 1973.

Date of Closure: This unit has been inactive since 1987.

Wastes Managed: This unit managed paint sludge (D008 and 003D). From 1980 until 1985, the waste was transported off site to Michigan Disposal, in Belleville, Michigan, for disposal. Prior to 1980 and from 1985 until 1987, the disposition of the waste is unknown.

Release Controls: The unit was located indoors on a concrete floor.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained no hazardous waste during the VSI. The unit contained truck chassis. No cracks in the concrete floor or visible evidence of spills were observed (see Photograph No. 5).

SWMU 6

Trash Compactor

Unit Description: The unit is located outdoors next to the Former Central Gondola Storage Pad (SWMU 3) on a concrete pad. The unit consists of a 20-cubic-yard container with a trash compactor, and measures 12 by 24 feet. The unit operates as a storage area for nonhazardous waste.

Date of Startup: This unit began operation in 1973.

Date of Closure: This unit is active for disposal of municipal trash. Until 1987, this unit was used for the storage of nonhazardous paint chips.

Release Controls: This unit has no release controls.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, the surface of the water in the unit as well as the storm water manhole near the unit contained water with a milky white sheen (see Photographs No. 7 and 8).

SWMU 8 Current CSA

Unit Description: The unit is located outdoors on a concrete pad. The unit is in the northeast area next to the Assembly Building and stores 55-gallon steel drums. The unit consists of a covered steel shed, measures about 30 by 12 feet, and operates as a less than 90-day storage area for hazardous wastes and as a storage area for product material.

Date of Startup: This unit began operation in 1985.

Date of Closure: This unit is active.

Wastes Managed: This unit managed nonhazardous phosphating sludge from 1985 until 1987. The unit currently manages spent toluene (F005), spent diesel fuel (D001), and product material. The disposition of the nonhazardous phosphating sludge is unknown. The spent toluene and spent diesel fuel are transported off site to Petro-Chem, in Detroit, Michigan, for fuel blending.

Release Controls: The unit is contained within a covered steel shed and it measures about 30 by 12 by 12 feet.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained two 55-gallon steel drums of spent toluene, two 55-gallon steel drums of spent diesel fuel (D001), and six 55-gallon steel drums of product material. During the VSI, the 55-gallon drums were in good condition and were stored closed on pallets. PRC noted no evidence of release (see Photograph No. 9).

SWMU 9

Asbestos CSA

Unit Description: The unit is outdoors on a concrete pad near the Nonhazardous CSA (SWMU 10). The unit consists of a covered 20-cubic-yard roll-off box and operates as a storage area for nonhazardous waste.

Date of Startup: This unit began operation in 1991.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous asbestos. The waste is transported off site to U.S. Pollution Control Industries, in East Chicago, Indiana, for disposal.

Release Controls: The unit is located outdoors on a concrete pad and is covered.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained about 20 cubic yards of asbestos during the VSI. The unit was covered and closed. PRC noted no evidence of release (see Photograph 10).

SWMU 10**Nonhazardous CSA**

Unit Description: The unit is located outdoors on a concrete pad in the north-central area near the Asbestos CSA (SWMU 9). The unit measures 40 by 8 feet and operates as a storage area for 55-gallon steel drums of waste.

Date of Startup: This unit began operation in 1993.

Date of Closure: This unit is active.

Wastes Managed: This unit manages caustic wastewater. According to a facility representative, the caustic wastewater is currently being analyzed to determine whether it contains hazardous constituents. The facility had a one-time generation of about 15 55-gallon steel drums of this waste. The disposition of this waste is contingent upon the analytical results.

Release Controls: This unit is located outdoors on a concrete pad, but has no other form of release controls.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, the unit contained 15 55-gallon steel drums of caustic wastewater. PRC noted minor waste stains near the unit; however, PRC noted no evidence of release from the unit to environmental media. During the VSI, the 55-gallon steel drums were on pallets in good condition and stored closed (see Photograph No. 11).

SWMU 11**Used Oil Accumulation Areas**

Unit Description: The unit is located indoors on a concrete floor and consists of about 15 55-gallon steel drums located throughout the Assembly Building.

Date of Startup:	This unit began operation in 1973.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous used oil that is transferred to the 800-Gallon Used Oil AST (SWMU 12) before disposal. The waste is transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.
Release Controls:	The unit is located indoors on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, one area contained about 30 gallons of used oil. The 55-gallon steel drums were also in good condition and stored closed. PRC noted oil stains on the concrete floor surrounding the unit (see Photograph No. 12).

800-Gallon Used Oil AST

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Wastes Managed: This unit manages nonhazardous used oil. The waste is transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

Release Controls: The unit is not covered and the steel roof has three brick walls surrounding it and it has no curbing surrounding the edge of the roof on the fourth side.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained about 200 gallons of nonhazardous used oil during the VSI. PRC noted puddles of used oil on the steel roof surrounding the unit. The pipes leading inside the Assembly Building were sealed (see Photographs No. 13 and 14).

4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI. This AOC is discussed below; its locations is shown in Figure 2.

AOC 1 Product Diesel Fuel ASTs

This area consists of two 60000-gallon ASTs constructed of steel for storage of product diesel fuel. The ASTs are about 20 years old. The ASTs are located on soil with a 3-foot concrete berm surrounding them. During the VSI, PRC noted fuel stains on one side of the ASTs and the vegetation surrounding the tank appeared to be stressed (see Photograph No. 15). It is not known if one of the ASTs leaked. Because of the staining noted on the side of the AST, and the fact that the ASTs are located directly on soil, PRC considers this an AOC.

DATE 10/20/97
RIN # 010798
INITIALS LJS

ENFORCEMENT
CONFIDENTIAL

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSII identified 12 SWMUs and 1 AOC at the GMC-NATP facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, located at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

SWMU I Former East CSA

Conclusions: The unit was located outdoors on soil. The unit consisted of 55-gallon steel drums on metal racks erected about 5 feet above the dike area on soil, measured about 120 by 75 feet, and operated as a storage area for greater than 90 days of hazardous waste.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit is inactive, RCRA closed, and no documented releases have occurred.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 2 Former West Gondola Storage Pad

Conclusions: The unit was located outdoors on a concrete pad and operated as a greater than 90-day storage area for hazardous waste. The unit consisted of a 20-cubic-yard roll-off box container.

RELEASED
DATE 10/20/97
RIN # 010798
INITIALS LJS

ENFORCEMENT
CONFIDENTIAL

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit is inactive, RCRA closed, and no documented releases have occurred.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 3 Former Central Gondola Storage Pad

Conclusions: The unit was located outdoors on a concrete pad and operated as a greater than 90-day storage area for hazardous waste. The unit consisted of a 20-cubic-yard roll-off box container.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit is inactive, RCRA closed, and no documented releases have occurred.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 4 Former Spent Solvent SAAs

Conclusions: This unit was located indoors on a concrete floor and consisted of two accumulation areas for hazardous waste. PRC noted no evidence of a release.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit is inactive, on a concrete floor, and no documented releases have occurred.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 5**Former CAA**

Conclusions: This unit was located indoors on a concrete floor near the paint booth. The unit consisted of an accumulation area for hazardous waste. PRC noted no evidence of release.

The potential for release to groundwater, surface water, air, and on-site soils is low because the unit is inactive, on a concrete floor, and no documented releases have occurred.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 6**Trash Compactor**

Conclusions: This unit is located outdoors on a concrete pad and consists of a 20-cubic-yard container with a trash compactor. This unit operates as a storage area for nonhazardous waste. From 1973 until 1987, the unit was used for the storage of nonhazardous paint chips.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit manages nonhazardous waste on a concrete pad, no documented releases have occurred, and the unit appears to be properly managed.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 7**Lime Wastewater Holding Tank**

Conclusions: This unit is located outdoors north of the facility's powerhouse and consists of an underground holding tank. It operates as a storage area for nonhazardous waste. The facility representative did not know the size of the tank or the

tank's construction material. PRC noted water with a milky white sheen in the unit and in the storm water manhole near the unit.

The potential for release to on-site soils is low to moderate because the tank is old, constructed of unknown material, and the water may contain hazardous constituents. The potential for release to groundwater, surface water, and air is low.

Recommendations: PRC recommends that the facility identify the source of the milky white sheen on the water surface. PRC also recommends sealing the underground pipes, and emptying and properly disposing of the contents in the unit.

SWMU 8 Current CSA

Conclusions: This unit is located outdoors on a concrete pad next to the Assembly Building. During the VSI, the 55-gallon drums were in good condition and stored closed.

The potential for release to groundwater, surface water, air, and on-site soil is low because no documented releases have occurred, the unit has secondary containment, and it appears to be properly maintained.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 9 Asbestos CSA

Conclusions: This unit is located outdoors in the north-central area next to the Assembly Building on a concrete pad. This unit consists of a 20-cubic-yard container that was covered and closed.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit manages nonhazardous waste on a concrete pad, no documented releases have occurred, and it appears to be properly maintained.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 10 Nonhazardous CSA

Conclusions: This unit is located outdoors on a concrete pad next to the Assembly Building. The 55-gallon steel drums were in good condition and stored closed during the VSI.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit managed nonhazardous waste on a concrete pad. No documented releases have occurred, and the unit appears to be properly maintained.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 11 Used Oil Accumulation Areas

Conclusions: This unit is indoors on a concrete floor in locations throughout the Assembly Building. During the VSI, the 55-gallon steel drums were in good condition and stored closed.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit manages nonhazardous waste indoors on a concrete floor, no documented releases have occurred, and the unit appears to be properly maintained.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 12**800-Gallon Used Oil AST****Conclusions:**

This unit is located outdoors on the steel roof of the Assembly Building and is not covered. This unit consists of one 800-gallon AST for storage of nonhazardous waste. PRC noted puddles of used oil on the roof surrounding the unit. The pipes leading inside the Assembly Building were sealed shut. The unit is not covered and the steel roof has three brick walls surrounding it and it has no curbing surrounding the edge of the roof on the other side. Therefore, during periods of heavy rainfall the waste may run off the roof onto the concrete area below and subsequently to on-site soils.

The potential for release to on-site soils is low to moderate because the unit is not covered and is not properly managed. The potential for release to groundwater, surface water, and air is low.

Recommendations:

PRC recommends that the facility cover the unit and practice better waste management techniques in order to prevent spillage of waste.

AOC 1**Product Diesel Fuel ASTs****Conclusions:**

This area consists of two 60000-gallon ASTs constructed of steel for storage of product diesel fuel. The ASTs are located on soil with a 3-foot concrete berm surrounding them. The ASTs are about 20 years old. During the VSI, PRC noted fuel stains on one side of the ASTs and vegetation surrounding the ASTs appeared to be stressed.

The potential for release to groundwater and on-site soils is moderate because one AST appears to have leaked a hazardous product material and the vegetation surrounding the ASTs appears to be stressed. The potential for release to surface water and air is low.

SEARCHED	ENFORCEMENT CONFIDENTIAL
INDEXED	
FILED	
INITIALS	

10/20/97
0107-48
tjw

Recommendations: PRC recommends that the facility conduct soil sampling for organic constituents and total petroleum hydrocarbons (TPH) at this AOC to determine if releases have occurred.

DATE	10/20/97	ENFORCEMENT CONFIDENTIAL
DATE	10/2/98	
DATE		
INITIALS	ty	

TABLE 3
SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Former East CSA	1973 - August 1989	None	No further action at this time.
2. Former West Gondola Storage Pad	1973 - August 1989	None	No further action at this time.
3. Former Central Gondola Storage Pad	1984 - August 1989	None	No further action at this time.
4. Former Spent Solvent SAAs	1973 - 1987	None	No further action at this time.
5. Former CAA	1973 - 1987	None	No further action at this time.
6. Trash Compactor	1973 - 1987	None	No further action at this time.
7. Lime Wastewater Holding Tank	1973 - 1991	Milky white sheen on surface of water	Identify the source of the milky white sheen on the water, seal the underground pipes, and empty and properly dispose of the contents in the unit.
8. Current CSA	1985 to present	None	No further action at this time.
9. Asbestos CSA	1991 to present	None	No further action at this time.
10. Nonhazardous CSA	1993 to present	None	No further action at this time.
11. Used Oil Accumulation Areas	1973 to present	None	No further action at this time.

DATE	10/20/97	ENFORCEMENT CONFIDENTIAL
FILE #	0107-98	
INITIALS	tyr	

TABLE 3 (Continued)

SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
12. 800-Gallon Used Oil AST	1973 to present	Used oil on the roof surrounding the unit.	The facility should cover the unit and practice better waste management techniques.
<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Product Diesel Fuel ASTs	1973 to present	Fuel stains on the side of one AST and the vegetation in the surrounding area appeared to be stressed.	The facility should conduct soil sampling for organic constituents and TPH.

DATE	10/20/97	ENFORCEMENT CONFIDENTIAL
RIN #	0107198	
INITIALS	ly	

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APPENDIX A
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
(10 Pages)

VISUAL SITE INSPECTION SUMMARY

General Motors Corporation - Northern American Truck Platforms
(Formerly General Motors Corporation - Truck and Bus Group)
601 Piquette Road
Detroit, Michigan 48202
MID 076 380 583

Date: June 3, 1993

Primary Facility Representative: Tom Henderson, Environmental Coordinator
Representative Telephone No.: (313) 974-3664
Additional Facility Representatives: Gary Stahle, Environmental Engineer
(313) 857-5197

Inspection Team: Ron Baker, PRC Environmental Management, Inc. (PRC)
Mary Joyce Freibert, PRC

Photographer: Ron Baker, PRC

Weather Conditions: Overcast, 60° F

Summary of Activities: The visual site inspection (VSI) began at 11:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 2:45 p.m. PRC inspected the Former East Container Storage Area (CSA) (SWMU 1), Former West Gondola Storage Pad (SWMU 2), Former Central Gondola Storage Pad (SWMU 3), Former Spent Solvent Satellite Accumulation Areas (SAA) (SWMU 4), Former Container Accumulation Area (CAA) (SWMU 5), Trash Compactor (SWMU 6), Lime Wastewater Holding Tank (SWMU 7), Current CSA (SWMU 8), Asbestos CSA (SWMU 9), Nonhazardous CSA (SWMU 10), Used Oil Accumulation Areas (SWMU 11), 800-Gallon Used Oil Aboveground Storage Tank (AST) (SWMU 12), and Product Diesel Fuel AST (AOC 1).

The tour concluded at 5:00 p.m., after which the inspection team held an exit meeting with facility representatives. The

VSI was completed and the inspection team left the facility at 5:30 p.m.



Photograph No. 1

Location: SWMU 1

Orientation: Southwest

Date: 06/03/93

Description: Former East CSA with the erected metal racks inside the 3-foot concrete berm and next to the Product Diesel Fuel ASTs (AOC 1)



Photograph No. 2

Location: SWMU 2

Orientation: North

Date: 06/03/93

Description: Former West Gondola Storage Pad in front of the facility's equipment



Photograph No. 3

Orientation: Southeast

Location: SWMU 3

Date: 06/03/93

Description: Former Central Gondola Storage Pad between the railroad track and metal carts



Photograph No. 4

Orientation: South

Location: SWMU 4

Date: 06/03/93

Description: Former Spent Solvent SAAs in the Paint Mix Room showing water on the concrete floor from rainfall leaking into the room and a 55-gallon steel drum of product material



Photograph No. 5

Orientation: South

Description: Former Spent Solvent SAs and Former CAA near the paint booth; this area currently contains truck chassis

Location: SWMUs 4 and 5

Date: 06/03/93



Photograph No. 6

Orientation: Northwest

Description: Trash compactor with 20-cubic-yard container on a concrete pad that had cracks which were sealed

Location: SWMU 6

Date: 06/03/93



Photograph No. 7
 Orientation: West
 Description: Three manhole lids of the lime wastewater holding tank

Location: SWMU 7
 Date: 06/03/93



Photograph No. 8
 Orientation: West
 Description: Lime wastewater holding tank manhole opened; note milky white sheen in the water

Location: SWMU 7
 Date: 06/03/93



Photograph No. 9

Orientation: South

Description: Current CSA showing 55-gallon steel drums of hazardous waste on a pallet; door was opened for the photograph

Location: SWMU 8

Date: 06/03/93



Photograph No. 10

Orientation: South

Description: Asbestos CSA that consisted of a 20-cubic-yard roll-off box; container is covered

Location: SWMU 9

Date: 06/03/93



Photograph No. 11

Orientation: Southeast

Description: Nonhazardous CSA located a concrete pad that had 55-gallon steel drums of caustic wastewater on pallets

Location: SWMU 10

Date: 06/03/93



Photograph No. 12

Orientation: Northeast

Description: Typical used oil accumulation area with oil stains on the concrete floor surrounding the unit

Location: SWMU 11

Date: 06/03/93



Photograph No. 13

Location: SWMU 12

Orientation: Northwest

Date: 06/03/93

Description: The 800-gallon used oil ASTs; note used oil on the steel roof surrounding the unit



Photograph No. 14

Location: SWMU 12

Orientation: Northwest

Date: 06/03/93

Description: The 800-gallon used oil AST; note used oil on the steel roof surrounding the unit



Photograph No. 15

Orientation: Southeast

Description: One of the Product Diesel Fuel ASTs; note: fuel stains on the side of the AST

Location: AOC 1

Date: 06/03/93

APPENDIX B
VISUAL SITE INSPECTION FIELD NOTES
(20 Sheets)

③

①

6/3/73

48%

Overcast

M. Tinkert, PRC

R. Bahoy, PRC

Bob Atkins, GMC

Gary R. Stalle, Powertrain

Tom Henderson, GMC

1919 -

Fisher Body - Division GMC

Tool & Dye Plant

Do not know if

undeveloped land

idea

1973 -

GMC

- Assembly Division

cut away Van Division

Base Chassis -

Structural Part of Van

G - Van

1974

P - Chassis - which

still - not painting

GMAO to - GMC

Chvrolet

type

→

(2)

6/3/93

1984 - 6MC - Trucks & Buses
Operations

1973 - 1974 - Paint Operations

Metal Cleaning
Phosphating of Metal
Painted

1974 - 87 Bumpers & Wheels

1987 - Discontinued Painting
Operations

- just do black chaotise
closure of units -

CSAs

1987 - 6MC - North American Truck
Platform (NATP)

1987 - 1993 - Discontinued painting
operations, the same

mgk 6/3/93

6/3/93

(3)

73 piece - to purge black chaotise line
Petro-Chem Detroit, MI

Painting Operations - cosmetic
Spray operation

As per for Biennial Reports
beginning in 1995.

Waste Stream - Paint Sledge Gondola
Paint Sledge - skinned paint
100-gallon containers -

hauled outside dropped
box - 20-cubic yard ->

Unit closed

Overgray curtain - released to

Sanitary - POTW (Detroit)

Holding Tank - size ??

mgk

④ 6/3/93

③ Methylene Chloride → Clean-
Solvents Paint & hooks
- accumulated

in 55-gallon - near
Paint Booth

④ Stored Hay Waste Shed
less than 90-days

⑤ Band Storage Area -
Stores empty 55-gallon
drums

⑥ Paint Chips - auto
compressor

⑦ Phosphatizing Line
1974 - 1986-87

Series dip - All above ground
⑧ Cleaning / Rinsing / Phosphatizing

1,000 gallon tank

⑨ Rinsewater

⑩ 510 dgs

6/3/93

⑤

Never used cyanide in the
treatment of metals.

was on Part A permit

any questions after today -
needs to be in writing.

19/9-1974

Body panel dyes

① Sandblast

② Wood dye -

③ Methyl dye - scrap metal

④ oil

⑤ Used oil - building of the
vehicle

- accumulated at each
repair area - 55-gallon drum
first

⑥

6/3/93

Used oil from topping
of transmission filtered,
General O.I.s → sent to

800 gal holding tank
for used oil

⑩

Scrap
Diesel fuel & gasoline -
55 gallon drum
Petro - Chem
H W Shed

⑪

Toluene - 55 gallon
H W Shed
Paint Mixing Room -
Accumulated

10 K AST - diesel fuel

1
MGT

⑦

6/3/93

2 150K AST are
empty

Used to hold #6 fuel
oil - process of

Closing power house - January 1992

Ash bags - Dry Stumbling
3 450MFT system

Cyclone System

Ash sent to

Maybe Landfill

Sanitary Landfill

3 UST

2 8K

west

gasoline

Relative West
East
NW Gasoline

10 to 15 K

Fiber glass

③

6/3/93

1991 - 15T installed
Old tanks were pulled
in 1990 and 1991

Has report on the pulling
of 15T - says will
give to Gov.

Any Permits

for 3 Bales - for house

Vehicle exhaust → stack
hot Lube gun

No NPDES permit

- Air emission violation -
minor last
couple yrs.
for

④

6/3/93

Will give us a copy

Gasoline overfill -
reported and documented
reported to fire depart
@MDNR -

in pump house

about 200 gallons in
Sanitary
sewer

- Will give us documentation
on the spill

8-foot chain link w/ barb
wire

24-hour security w/ cameras -
on peripheral corners
/
MFF

(10)

6/3/93

Geology

Facility on

Blue Clay
— about 1,000 ft down

Salt Mine

Shafter Hwy

closest surface water

Detroit River

surface H₂O

3 1/2 miles ~~SW~~ South

Drinking water

Lake Detroit — Fort Huron

No ground water wells

in the area

City on Lake Detroit

MONR

Northfield Office

— info on wells

I-575

~~MT~~

6/3/93

(11)

N —

Grand Trunk Railway

E —

I-75 — CCI

Commercial Carrier Inc.

— Storage Area

W — Meat Market (Retail)

Burtin

S —

Cannex Paint / Fischer

Body

Barbary — abandoned

500 employees — ^{mt} Dis. 8/14/93

SW — Residential — 2 blocks

Facility about 12 1/2 acres

Industrial area — zoned

2:15 PM Facility Tour

To look at

At Painting Operations

— 100-gallon tanks — 5 km²

— Waste H₂O building — tank

(12)

6/3/93

- ✓ Outside paint s/dge gondola - so where yard container
- ✓ 55 gallon SAA - methylene chloride and solvents
- ✓ Cesspool HW Spod (SSA)
- ✓ Barrel Storage Area
- ✓ Compressor - Paint Chips
- ✓ Phosphating Line - 5 tanks
- ✓ Repair area - 55 gallon drum of used oil
- 300 gal tank for Used oil
- ✓ Paint Mixing Room - 55 gal drum

(13)

6/3/93

- ✓ Tower house - asbestos removal
- ✓ Cyclones for ash
- ✓ 3 USE
- ✓ ASTs - where spilled occurred.
- ✓ 55 gal scrap dust fuel and gasoline
- Photos
- ✓ Paint Booth Operations / Phosphating Line in concrete floor direction. South
- ③ Paint Mix Room - South
- 55 gallon toluene SAA
- water on the ground - holes in wall.
- holes for air return -

M/F

(15)

6/13/93

(3) South - 4/10 Sued
D 55- gall. Toluene & Hydrocarbons
T003 30 gal.

(2) 55- gal - grease 110 total
(3) Diesel of fuel 8001 - 255 gal
1 1/2 bags of product - toluene

total 6 drums
6 product drums

(9) North - Paint Storage
Gondola - Closure of unit -
Sent Samples

(10) North - 1 - Compressor
w/ 20- cubic yards
Landfill

(11) Ashes - Powerhouse
Removal container
South
MRF

6/13/93

(4) ~~East~~ Northeast
Used oil - AHA
3 USTs - New
Leak detection system
direction - east

(6) North - Barrel Storage
Area - Part A

(7) Empty drums
Storage area - inside
dike area - West
Closure of unit

Batteries - sent Retberg
AC Delco Reming
Toledo, Ohio
120 batteries

MRF

(16)

6/3/93

(12)

20 cubic yard
container - gondola
Paint sludged
Southeast

(13)

Southeast -
Rinse water from
cleaning empty
Storage area

(14)

Time holding tanks (3) for
blowdown of boilers
West - Direction
Hankole next to
them

(15)

West - open to tank
City Environmentals
Frederick Street
West

(17)

6/3/93

operation -

Pug Mill - Delivered
City Sand & Gravel
Land Disposal

Detroit

detrital pellets

(16) & (17)

Used oil tank
GVO gel -

Drain that leads
to sanitary sewer

Septic tank - digester plugged
General diff. recycling

Major all all over

Floor - No roof
on top of room

Pipe to underneath
for emptying tank

West

(13)

6/3/93

4:45 PM Facility tour finished

4:50 PM Received info for

① Air and liquid spill release

② air permits

③ Closure plan for CSAs

④ Biennial reports for 1995 to current

T. Henderson will

Send info about

① UST closure Plan

② Boiler Ash - Reposition

③ Painting operations -

holding tank - the

size of it

by June 11

WPC

(14)

6/3/93

Asked for biennial reports for before 1985

5:00 PM Closing meeting

5:30 PM off-site

WPC

June 3, 1993
RHB

(138)

1115 at GMC Bus: truck

601 Depot Rd, Detroit, MI

Weather → overcast ~ 58-62°F

- Met with Mr. Tom Henderson

boss, boss and 5 others -

we will
attach
copy -

Various individuals from Corp.

note tables etc.

an attendance
sheet was
passed -

- Mary F. explaining the process

Mr. Henderson

stated that

the plant never operated

a wastewater treatment unit

- Mary explains contents of

inspection - based on TSP

stated -

Plant Waste management

~~plant~~ operations / current

RHB - 6/3/93

(139)

June 3, 1993

Closure was conducted by
CLM - in 19

- History -

1919 - Fisher body tool in die
Plant -

Not sure if plant was
constructed then -
would have to look at
property title -
made dies and patterns for stamping mill -

1973 - General Motors assembly
division (AD) - changed to

but - away Van assembly.
Full size [Revised Printing]

1974 - converted to P-chassis -
Warranty Building
Withdrawn Management from
RHR 6/9/93

(140)

June 3, 1993

Gen Motors Ad to GM Chevrolet

1984 Gen Motors → Bus and
truck group - (Name
change only)

1974-1987 - did bumper and wheel
finishing - discontinued the
paint shops and prime operations

Preparation was for pre-paint finish
on bumpers and body panels

1987-1989 - closure procedure -
- closure plan -

[we can get a copy of the
closure plan and soil boring
results - also certification of
closure
RHR 6/3/93]

(141)

June 3, 1993
New Name

North American Truck Plastics

(142)

June 3, 1993

1200 - Lunch Break
1245 - Return Lunch

→ essentially operations since 1984 - Waste streams - Paint Sludge -

was conducted since 1984 - Water Contain - overspray of paint booth - collected

Lowest method of painting - Sludge in a 100-gallon
is a spray application of - that material was
solvent based spray paint - taken to a 'drop box'

toluene is used to flush - by outside facility - 20 cu yd.
lines after line is shut - ~~the~~ ^{ground} in - closed & area -
down - ~~Paint sludge water~~

May is asking for Sludge Reports - → Waste water was analyzed before
to see past wastes generated - being released to Detroit
- currently not required to ~~sewer~~ ^{sewer} (sewer is combined storm
and sanitary)

File behind as CESAG - ~~sewer~~ ^{sewer} configuration of holding tank
and exact procedures for
holding wastewater from

6/3/93

Water contain system 6/3/93

(143)

June 3, 1993

Methylene chloride solvent →

* Satellite and C&A - how

Leakdowns waste shed not closed
Leakdowns waste shed not closed
C&A - how

T2 - cubic yard container and

gradually re same spot?

Meth Chloride - used in clean woods
used in print line -

speculative -

* Carpenter - general print

rubbish - ? ?

- Will call someone from print

area to research practices

waste management

Phosphating operations -

Jim Little 1986-87 operated since

1973

R.L. 6/3/93

(144)

June 3, 1993

Entire in facility →

* Dip tank system →

series of mass-cleaning - phosphating
→ waste water > sludge

→ Mr. Henderson was not familiar

→ enough with the phosphating

system to delineate the

existing waste coming from the phosphating

system and their dispositions

People with knowledge of

phosphating operations are

few - really only available

information is from business

reports →

Put into writing →

Waste oils - engine fluids -

gear box, power steering - etc.
Put into drums -

R.H.S. 6/3/93

(145)

June 3, 1993

* 55-gal drums taken to show an accumulation - tank in another part of plant
800-900 gallon tank
then to local oil recycler
(get name for - copy of Brenner)

55-gallon drums of gasoline from unsold tanks - goes to local to Petrochem bundled in 290-dry shed -

Toluene from the flush accumulated in 55-gal drums +

shed - go petrochem

55-gal/6 mo

6/3/93

June 3, 1993 (146)

Diesel is above ground

2000 gal inside diked area within fuel oil

(2) 150,000 gal petro plant operate dry scrubbing system generated

* ash into wet bags - Recently -
rate? disposition?

- in records we will have to look at later

(2) 8,000 gallon UST's

(1) gasoline (west tank)

(1) transmission fluid

(1) 15,000 gallon tank

(1) gasoline

all installed in 1991 -

tanks previously were pulled in 1991

6/3/93

(147)

June 3, 1993

air permits —

(3) major permits currently going to drop ~~the~~ because boilers off-line

several air permits — vehicle exhaust

glue guns — etc painting — etc

Wayne County Air Pollution Control Division — has records and complaints

— Air Incident — opacity
Mrs. Tammie Henderson will give us a copy of Report

6/3/93

(148)

June 3, 1993

Delaware — on map —

— gasoline spill — overflow tank

spill from vent along pump house spill entered the sewer was cleaned by the fire dept.

Sensitivity. 8' fence — electronic gates — 24 hour, 7 days week

— surface water — Detroit River
3/4 miles south ~~west~~ of facility

— Geology — clay overlying basin
sediments — Salt mines 1,000' deep

their closure Report from
EUM includes boring logs
Mrs. Henderson will provide —

6/3/93

(149)

June 3, 1973

Nashville office - C. G. G. G.

275 - MDNR bus geologic

map of Detroit area

- Denby water from Lake Huron -

Property boundaries -

I-75 - on East International

Garage

West - Zinkow - west marker

old Dodge facility

North - Grand - West

Railroad

South - Park's lot old Fisher Body

Garage - Berling now -

Not owned by GM any longer

- Zoned heavy industrial -

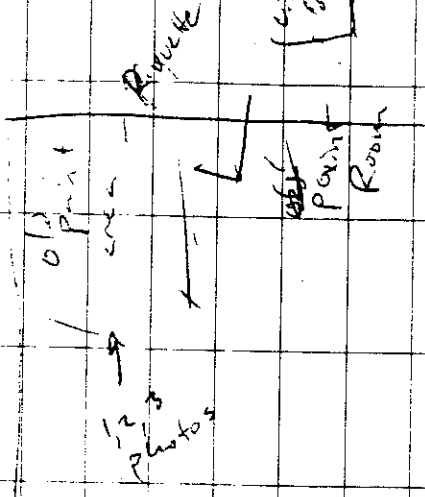
W. H. B. 6/3/73

(150)

June 3, 1973

1445 - Sevin facility, tour -

at



Photos

1-3 of old paint line -

Phosphating area -

Concrete floor - used to vent

through roof to outside

Photo

4 - where solvent paint purge

Room - satellite area -

6/3/73 empty at time of inspection

(151)

June 3, 1993

concrete floor - with seams
room also used for product
piping in tanks =

Photo 5 - looking south-east
from tank - vehicle fluids
bottles - in concrete
in (2) 55 gallon drums -
in chassis staying area
(final process area)

Photo 6 - USTs - looking east
(3) described previous

No Photo 7 - from phosphor -
manhole - gas spill entered
looking west from roof of
pump house =

RJR
6/3/93

June 3, 1993

concrete floor - with seams
room also used for product
piping in tanks =

Photo 5 - looking south-east
from tank - vehicle fluids
bottles - in concrete
in (2) 55 gallon drums -
in chassis staying area
(final process area)

Photo 6 - USTs - looking east
(3) described previous

No Photo 7 - from phosphor -
manhole - gas spill entered
looking west from roof of
pump house =

RJR
6/3/93

(152)

June 3, 1993

Diesel fuel 1,000 gallon tank
same spillage around discharge pipe
No Photo area asphalted

Photo 7 - Empty drum storage area
- looks North -
outside dike area
bins empty - during inspection
- area is covered with
asphalt

- AC Delco battery (GM) Registered
in Sheddler -
Kept in same area =

Photo 8 - Rocks inside North
wall of Dike -
old storage area

RJR
6/3/93

(153)

June 3, 1993

Photo - inside diked area

9 East 150,000 gal tank

apparent spill area -

Photo 10/12 storage shed

4 55-gallon drums

total, 742-pistol =

looking South

Photo 11/14 storage Box Pad -

cloud container storage

area - looking North across

Rail spur - on concrete

Photo 12/17 trash cans

12 looking West/Northwest

RAH

6/3/93

(154)

June 3, 1993

Photo 13 UPR

balliff - powerhouse

asbestos - 22 yard -

Photo 14 fence 20 ea yd.

4 - 600 accumulation area

/pours to Photo 11 area -

Photo 15 Pinsake drums for

empty drums cleaned

chance area - Rotherly -

in form coal bin area

adjacent to boiler

where bags were accumulated

from cyclones -

- (we couldn't see the area)

to yd area no bags

and asbestos removed under

process)

RAH 6/3/93

(155)

June 3, 1993

Photo holding tank, sub

6 boiler bleed down -

tanks constructed of



Photo

inside above in tank

17 below down tank -

no whitish water

Photo

water in storm

drain ~ 10 feet from

outgoing

bleed down tank -

Photos

18; Third floor waste oil

19 holding tank -

drains to truck -

* - rain drain in corner where

off of roof where

drain is - maybe plugged

3/2/93

2/1/93

6/3/93

(156)

June 3, 1993

According to Mr. Henderson the

drain is plugged so it will

not discharge to the sewer

system -

we looked at the 2 out end

of tank -> 2 on second floor -

it was ~~also~~ RAB

- Closing meeting -

Facility: Did you see any major concern?

I indicated to Mr. Henderson

that the apparent release

was inside the ditch area

concerned me -

My explanation the report

and the effluent from 1

The report

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

John Hannah Building, P.O. Box 30241, Lansing, MI 48809

ROLAND HARMES, Director

NATURAL RESOURCES
COMMISSION

JERRY C. BARTNIK
LARRY DEVUYST
PAUL EISELE
JAMES HILL
DAVID HOLLI
JOEY M. SPANO
JORDAN B. TATTER

10/20/97
DATE
0107-98
INITIALS
JW

October 28, 1993

CONFIDENTIAL

Ms. Laura Lodisio, Chief (HRE-8J)
MI/WI Technical Enforcement Section
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Ms. Lodisio:

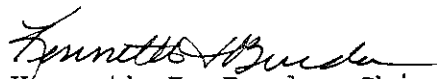
SUBJECT: Comments on Draft PA/VSI
GMC Northern American Truck Platforms
Detroit, Michigan
MID 076 380 583

Thank you for the opportunity to review the enclosed draft PA/VSI for the subject facility. At this time, we have attached our comments. Based on our information, we concur in general with the recommendations presented in the Executive Summary.

This review is intended to identify major deficiencies in the draft PA/VSI. This review does not represent an exhaustive file search or technical analysis, and does not verify the accuracy of information presented in the draft PA/VSI.

Please contact me if you have any questions.

Sincerely,


Kenneth J. Burda, Chief
Hazardous Waste Program Section
Waste Management Division
517-373-0530

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

May 25, 1993

RECEIVED
WMD RCRA
RECORD CENTER
JUN 15 1993
Comp

Mr. Tom Henderson
General Motors Truck and Bus Operations
Detroit Assembly Plant
601 Piquette
Detroit, Michigan 48202

Re: Visual Site Inspection
General Motors Truck and Bus Operations
Detroit, Michigan
MID 076 380 583

Dear Mr. Henderson:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are

Mr. Henderson
May 25, 1993
Page 2

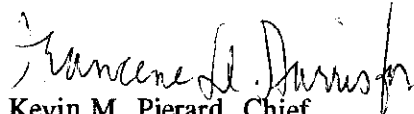
necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for June 2 at 11:00 a.m. The inspection team will consist of Ron Baker and Mary Joyce Friebert of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Michigan Department of Natural Resources (MDNR) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Dennis Drake - MDNR, Lansing
Ken Bruda - MDNR, Lansing
Roger Przyloysz - MDNR, Grand Rapids



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED MAY 27 1993
WMD RCRA
RECORD CENTER *Compliance*

REPLY TO THE ATTENTION OF:

HRE-8J

May 25, 1993

Mr. Tom Henderson
General Motors Truck and Bus Operations
Detroit Assembly Plant
601 Piquette
Detroit, Michigan 48202

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General Motors Truck and Bus Operations
Detroit, Michigan
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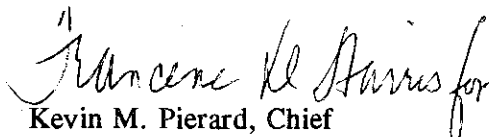
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The VSI has been scheduled for June 3 at 11:00 a.m. The inspection team will consist of Ron Baker and Mary Joyce Friebert of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Michigan Department of Natural Resources (MDNR) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

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Sincerely yours,


Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Ken Burda - MDNR, Lansing